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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**, for inclusion in Senior Counsel's Brief, the following documents:

1. 13 folders arranged according to the **enclosed** index;
2. Four folders of DoCS documents arranged chronologically and by plaintiff (with those documents relevant to Kathleen Biles either duplicated or extracted);
3. Four folders of documents served as evidence intended to be relied upon by the defendant at the hearing of the limitation applications;
4. Documents produced on subpoena by Victims Compensation Tribunal (Packet 16), with those parts relevant to Kathleen Biles' limitation application extracted; and
5. Documents produced by Brewarrina Hospital (Packet 5), with those parts relevant to Kathleen Biles' limitation application extracted.

Yours faithfully

Evangelos G Manollaras
Solicitor
for Crown Solicitor

Encl. *[delete if not required]*