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**To:** swoods <swoods@wentworthchambers.com.au>  
**Cc:** Jodie\_Vella <"jodie\_vella@sixthfloor.com.au,">  
**Sent:** Friday, 10/02/2012 02:20 PM  
**Attachments:** Doc2.docx  
**Subject:** Re: FW: Document2

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CSO REFERENCE: 200801481 - D2012/43597

Steven

Cards on the table is fine, and I think the department would agree, if asked, but I don't think we need give them our witness list. The identity of who may or may not be available is revealed in documentation which has been produced on subpoena. That includes the Bethcar file from DOCS, and the transcript of the criminal trial of Colin Gibson (albeit that what transcript was produced on subpoena was incomplete, and Jodie had to go to Court Reporting to find the missing bits). Couldn't we respond by saying that, ie the identity of all possible witnesses are contained in documents produced on subpoena. Surely we don't have to read all the material and provide for them a one page summary.

Evangelos G Manollaras  
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for Crown Solicitor

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10/02/2012 02:58 PM

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fyi

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Subject: Document2

Michael/Paul

I have asked Jodie to fix up the formatting.

I am hesitant re the last part of the answer to 2(a).  
It smacks of a defendant (the State, no less!) wanting it both ways- we are prejudiced, but we won't tell you if we have any good evidence/dirt.  
I think, tactically, cards on the table is better.  
We do not, on my understanding, have any good bits of secret knowledge, so let's say so.

Paul, can you think about this, and then we can discuss a better response.

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