

**From:** Jodie Vella <"notes:cn=jodie vella/ou=cso/o=nsw\_ag">  
**To:** swoods <swoods@wentworthchambers.com.au>  
**Cc:** evangelos\_g\_manollaras <evangelos\_g\_manollaras@agd.nsw.gov.au>  
**Sent:** Friday, 10/02/2012 03:21 PM  
**Subject:** Re: Letter to BJ re request for particulars Russell Booby - Bell Johnson Solicitors (2)

---

CSO REFERENCE: 200801481 - D2012/43458

Hi Steven

Can I just check something re the letter.

Because PM's affidavits only show why the def is prejudiced by the effluxion of time, all the named witnessess are deceased or cannot be contacted etc.

My interpretation is that they're asking us, wrongly or rightly, about the other witnessess that may be available to give evidence for the defendant on the issues (ie. the issues of the substantive proceedings).

Are we saying, in response, that to answer their question would be to form an opinion? But, haven't we similarly formed an opinion, then, to identify what witnessess may have been helpful, but are no longer available, and therefore arguing that we're prejudiced.

Kind regards  
Jodie Vella  
Paralegal  
for Crown Solicitor

NSW Crown Solicitor's Office | Level 5, 60-70 Elizabeth Street, Sydney NSW 2000  
GPO Box 25 SYDNEY 2001 | DX 19 SYDNEY | www.cso.nsw.gov.au  
Email: jodie\_vella@agd.nsw.gov.au | Tel: (02) 9224 5266 | Fax: (02) 9224 5122

Steven Woods <swoods@wentworthchambers.com.au>  
10/02/2012 03:43 PM

To  
"Jodie\_Vella@agd.nsw.gov.au" <Jodie\_Vella@agd.nsw.gov.au>  
cc

Subject  
Letter to BJ re request for particulars Russell Booby - Bell Johnson  
Solicitors (2)

Final version- send out after correcting format[attachment "Letter to BJ re request for particulars Russell Booby - Bell Johnson Solicitors (2).doc" deleted by Jodie Vella/CSO/NSW\_AG]