Dear Ms Blair

We refer to your email of the 18 March 2015 attaching the written statement provided by Mr Craig Leggat SC dated 2 March 2015.

We apologise for the delay in replying to your email and missing today’s 10.00 a.m. deadline but we were only recently able to obtain instructions from our client.

Although the statement by Mr Leggat SC does not appear relevant to Ms Manning’s interests she does wish to object to the statement being tendered on the following basis:

1. Mr Leggat had more than ample opportunity to provide a statement before or during the course of the Royal Commission’s Public Hearings;
2. Shishy’s evidence in her statement (STAT.0403..001.0001 at paragraph 73) and given orally (T.11213:34-38) that she “told a lawyer friend” was unchallenged by any interested party;
3. Mr Leggat’s statement adds nothing of significant value to the evidence already obtained by the Royal Commission;
4. Other parties who have given evidence to the Royal Commission may feel aggrieved that they have not had the opportunity of tendering additional statements to corroborate their evidence previously given to the Royal Commission.

Yours faithfully,
Michael Taylor
HUGHES & TAYLOR

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