



Your ref:
Our ref: PL9/PRE052/2103/SZL
Contact: Louise Svme
Direct ph:
Direct fax:
Email:

Crown Law

Department of
Justice and Attorney-General

6 October 2015

The Commissioner
Barrett Adolescent Centre Commission of Inquiry
Level 10, 179 North Quay
BRISBANE Q 4000

By email to: mail@barrettinquiry.qld.gov.au

Dear Commissioner

Barrett Adolescent Centre Commission of Inquiry - State representation

We refer to the Requirements to Produce Documents (Notices) issued to the appropriate officers of Queensland Health, the Department of Education and Training, the Department of Housing and Public Works, the Department of Communities, Child Safety and Disability Services, the Department of the Premier and Cabinet and Queensland Treasury on 14 September 2015 and 15 September 2015.

We write seeking an extension of time for compliance with each of the Notices such that compliance is not required until **4pm on 12 October 2015**.

Crown Law has been advised today that software has been purchased to allow for the proper searching and consideration of the large volumes of material that have been obtained from Queensland Health and the Department of Education and Training in particular in response to the Notices. The establishment of that software is anticipated to take a few days before materials can be produced.

Further, Counsel representing the State has made arrangements to meet with Counsel Assisting on Wednesday 7 October 2015 to discuss the scope of the Notices and the Terms of Reference for the Inquiry with a view to seeking additional information and clarification which may impact on the production of documents in response to the Notices. This meeting has been sought in the context of Crown Law receiving large volumes of material over the

State Law Building
50 Ann Street Brisbane
GPO Box 5221 Brisbane
Queensland 4001 Australia
DX 40121 Brisbane Uptown
Telephone 07 3239 6703
Facsimile 07 3239 0407
ABN 13 846 673 994

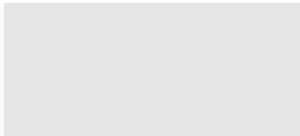
EXHIBIT 2

Barrett Adolescent Centre Commission of Inquiry - State representation

last week to 10 days and the review of that material highlighting issues that require clarification to ensure that the appropriate documents are produced in response the Notices.

We will continue to produce documents as soon as practicable and, where relevant, will provide an update in relation to the production of Cabinet documents by **4pm on Monday 12 October 2015.**

Yours sincerely



Louise Syme
A/Assistant Crown Solicitor
for **Crown Solicitor**

EXHIBIT B5

Barrett Adolescent Centre Commission of Inquiry

Your Reference: PL9/PRE52/2103/SZL
In reply please quote: 569976/1; 3022816

Level 10, 179 North Quay
Brisbane Queensland 4000
PO Box 13016
George Street Post Shop
Brisbane Queensland 4003
Telephone +61 7 3239 6040
Email info@barrettinquiry.qld.gov.au
Web www.barrettinquiry.qld.gov.au

Louise Syme
Crown Law
GPO Box 5221
BRISBANE QLD 4001

By email to: [REDACTED]

Dear Louise

Barrett Adolescent Centre Commission of Inquiry – State Representation

We refer to your letter of 6 October 2015 forwarded to Catherine Muir, Junior Counsel Assisting the Commission.

The Commission has considered your request for an extension and considers that in the circumstances outlined by you, your request is reasonable.

Accordingly we confirm that an extension for time for compliance with each of the Requirements to Produce Documents issued to the appropriate officers of Queensland Health, the Department of Education and Training, the Department of Housing and Public Works, the Department of Communities, Child Safety and Disability Services, the Department of the Premier and Cabinet and Queensland Treasury has been extended until **4:00pm on Monday 12 October 2015**.

I understand that Ms Muir is corresponding separately to you in relation to the issues you raised at the meeting on 7 October 2015.

Yours sincerely

per
[REDACTED]
Ashley Hill
Executive Director
Barrett Adolescent Centre Commission of Inquiry
09/10/2015

EXHIBIT B6



Your ref:
Our ref: PLF/PRE052/2103/SZL
Contact: Louise Syme
Direct ph:
Direct fax:
Email:

Crown Law

Department of
Justice and Attorney-General

2 November 2014

The Commissioner
Barrett Adolescent Centre Commission of Inquiry
Level 10
179 North Quay
BRISBANE 4000

By email: mail@barrettinquiry.qld.gov.au

Dear Commissioner

Barrett Adolescent Centre Commission of Inquiry - State representation

We refer to the Requirement to provide documents issued to Mr Michael Hogan, Director-General of the Department of Communities, Child Safety and Disability Services (DCCSDS) on 15 September 2015 (the Notice).

On 2 October 2015, we wrote seeking an extension of time to comply with that requirement until 4 pm on **Wednesday 7 October 2015**. On 6 October 2015, we wrote again seeking a further extension of time until 4 pm on **Friday 12 October 2015**.

On review of my files I note that I did not receive confirmation that an extension of time had been granted until 12 October 2015. As such, I erroneously proceeded on the basis that my 6 October 2015 request for extension had been granted.

On 12 October 2015 I spoke with Ms Muir of Counsel Assisting about the continued production of documents in PDF text searchable format, which was not fully compliant with the Document Management Protocol. At that time I anticipated that Crown Law could produce documents compliant with the Document Management Protocol by 21 October 2015.

State Law Building
50 Ann Street Brisbane
GPO Box 5221 Brisbane
Queensland 4001 Australia
DX 40121 Brisbane Uptown
Telephone 07 3239 6703
Facsimile 07 3239 0407
ABN 13 846 673 994

Barrett Adolescent Centre Commission of Inquiry - State representation

On 15 October 2015, Ms Muir confirmed that the Commission would prefer to receive the balance of documents in accordance with the Document Management Protocol. Ms Muir also recommended that I make further requests for extensions of time in writing.

Since 15 October 2015 Crown Law has continued to work towards providing documents in a format that complies with the Documents Management Protocol. On 15 October 2015 I sought an extension of time for Queensland Health to allow for compliance with a requirement issued to that department. At that time I should also have made a request for an extension of time on behalf of DCCSDS. I apologise for not making a timely request for an extension of time that day.

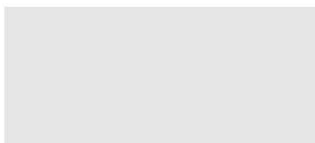
In compliance with the Notice issued on 15 September 2015, I have **enclosed** with this letter the final two documents to be produced from DCCSDS. Those documents are:

- View Contact Log_7313-[REDACTED] 0000-1940.pdf
- View Contact Log _7313-[REDACTED] 0000-1940_2.pdf

Both of these documents are provided in response to paragraph 12 of the Notice. The disclosure of these documents amounts to full disclosure on behalf of DCCSDS.

I seek a brief further extension of time until **4 pm Friday 6 November 2015** to allow for all documents disclosed on behalf of DCCSDS to be provided in a format that complies with the Document Management Protocol.

Yours sincerely




Louise Syme
Special Counsel
for Crown Solicitor

EXHIBIT B7

Barrett Adolescent Centre Commission of Inquiry

Your reference: PL9/PRE052/2103/SZL

Level 10, 179 North Quay
Brisbane Queensland 4000
PO Box 13016
George Street Post Shop
Brisbane Queensland 4003
Telephone +61 7 3239 6040
Email info@barrettinquiry.qld.gov.au

Mr Michael Hogan
Director-General
The Department of Communities, Child Safety and Disability Services
c/- Crown Solicitor
By email to: 

Dear Ms Syme

Barrett Adolescent Centre Commission of Inquiry – Production of Documents by Mr Michael Hogan

I refer to your letter of 28 September 2015 in which you enclosed a USB containing documents produced by Mr Michael Hogan, Director-General of the Department of Communities, Child Safety and Disability Services.

The Commissioner has upheld your client's application for confidentiality in relation to these documents. They will be handled in accordance with the Order made on 15 October 2015, the Confidentiality Protocol published on 12 October 2015, and Practice Guideline 02/2015 published on 30 October 2015.

I note your acknowledgement that the disclosure amounted to partial compliance with the notice to produce documents issued to Mr Hogan, and inquire when the Commission can expect to receive full compliance.

Yours sincerely


Ashley Hill
Executive Director
Barrett Adolescent Centre Commission of Inquiry
02/11/2015

EXHIBIT B8



Your ref:
Our ref: PL9/PRE052/2103/SZL
Contact: Louise Syme
Direct ph:
Direct fax:
Email:

Crown Law

Department of
Justice and Attorney-General

2 October 2015

The Commissioner
Barrett Adolescent Centre Commission of Inquiry
Level 10, 179 North Quay
BRISBANE Q 4000

By Hand

Dear Commissioner

Barrett Adolescent Centre Commission of Inquiry - State representation

We refer to the Requirement to Produce Documents issued to Ms Fionnagh Dougan, Chief Executive of Children's Health Queensland Hospital and Health Service and to Ms Jane Yacopetti, Chair of the Children's Health Queensland Hospital and Health Service Board both dated 23 September 2015.

On the **enclosed** USB is a folder titled "*RTP- CHQHHS and Board*" containing the following relevant documents:

Number	Document	Date	RTPD Reference
1.	Folder titled ' <i>Operation and Management Review</i> ' containing the following documents: 1. BAC Review Report 2009; 2. BAC Review Summary 2009; 3. Developing objective criteria for reviews - Memorandum from Trevor Sadler; 4. Four issues with the BAC MOS; 5. Hand written notes by Kristin with regards to ongoing BAC arrangements; 6. Judi Krause email discussions around BAC MOSD;	Various	7

State Law Building
50 Ann Street Brisbane
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DX 40121 Brisbane Uptown
Telephone 07 3239 6703
Facsimile 07 3239 0407
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EXHIBIT 2

Barrett Adolescent Centre Commission of Inquiry - State representation

Number	Document	Date	RTPD Reference
	<ol style="list-style-type: none"> 7. Letter request for ongoing development of MOS and confirmation of governance arrangements; 8. Mental Health Capital Works Program Meeting Agenda and Minutes; 9. Model of service delivery for the adolescent integrated treatment and rehabilitation centre; 10. Response to the 2009 Review of Barrett Adolescent Centre; 11. Review of consumer incidents at Barrett Adolescent Centre - Terms of Reference and Recommendations; 12. Summary of issues to consider when reviewing the Model of Service Delivery for Barrett Adolescent Centre; 13. BAC MOS Extraordinary Meeting Minutes; 14. BAC Sensory room documentation; 15. BAC Service Delivery Models Guidelines and cover letter; 16. BAC Site selection response to report; 17. Communication Plan Redland Adolescent ETU March 2012; 18. Emails regarding BAC consumer data, diagnosis data and wait list consumer age; 19. Evaluation of proposed Tier 2 services; 20. Feasibility and study reports relating to ongoing and future arrangement for BAC; 21. Overview of BAC and Model of Care 2003 and 2007; and 22. Rebuild of BAC 		
2.	<p>Folder titled '<i>Closure Decision</i>' containing the following documents:</p> <ol style="list-style-type: none"> 1. BAC Media Statements; 2. BAC Strategy speaking notes; 3. Barrett Adolescent Strategy Project Plan; 4. ECRG Media Protocol; 5. ECRG Terms of Reference; 6. Emails from Sharon Kelly to staff regarding draft plans; 7. Expert Clinical Reference Group Meeting Agendas; 	Various	8

EXHIBIT 2

Barrett Adolescent Centre Commission of Inquiry - State representation

Number	Document	Date	RTPD Reference
	<ul style="list-style-type: none"> 8. Expert Clinical Reference Group Meeting Minutes; 9. Expert Clinical Reference Group Recommendations July 2013; 10. West Moreton BAC Plans (Various); 11. West Moreton BAC Strategy Meeting Minutes; 12. Adolescent Mental Health Continuum Service Analysis DRAFT; 13. BAC Patient Profiles; 14. Barrett Adolescent Centre Referrals from Mater CYMHS; 15. Clinical Child Psychology and Psychiatry; 16. Communications around Barrett Adolescent Centre; 17. ECRG Communications Log; 18. ECRG Confidentiality and COI agreement for Josie Sorban; 19. ECRG Draft Service Model Elements; 20. ECRG Feedback Register; 21. ECRG Planning Group acceptance of recommendations; 22. Essential Components of an Adolescent Extended Treatment and Rehabilitation Service; 23. Examining Factors Influencing Length of Stay; 24. Great Ormond Street Hospital for Children NHS Trust, The Mildred Creak Unit; 25. In-Patient Treatment - The Oslo Model Brochure; 26. Letter Invitation ECRG - Ms J Sorban; 27. List of Adolescent Mental Health Services Delivered by Non-Government Organisations; 28. Proposed service model elements for Adolescent Extended and Rehabilitation Services; 29. Should inpatient care be a component of the new model; 30. Update on Project Timeframes; and 31. West Moreton BAC FAQ and Fast Facts 		

EXHIBIT 2

Barrett Adolescent Centre Commission of Inquiry - State representation

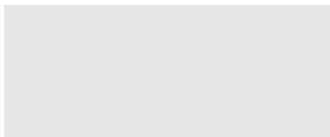
This disclosure is partial disclosure in response to the above mentioned Notice.

Children's Health Queensland have provided additional documents for consideration and advice on disclosure including a large volume of documents received today. In addition to advices being required in relation to those documents, a number of those documents have not been provided in text searchable PDF format as yet.

Children's Health Queensland seeks an extension of time for compliance, to allow for further advices to be taken and instructions to be given, until **4 pm on Friday 9 October 2015**.

We will continue to produce documents as soon as practicable and will confirm full compliance upon receipt of instruction from our client that all relevant documents have been disclosed.

Yours sincerely

A rectangular grey box redacting the signature of Louise Syme.

Louise Syme
A/Assistant Crown Solicitor
for **Crown Solicitor**

encl

EXHIBIT B9



Queensland
Government

Crown Law

Department of
Justice and Attorney-General

Your ref:
Our ref: PL9/PRE052/2103/SZL
Contact: Louise Svme
Direct ph:
Direct fax:
Email:

9 October 2015

The Commissioner
Barrett Adolescent Centre Commission of Inquiry
Level 10, 179 North Quay
BRISBANE Q 4000

By Hand

Dear Commissioner

Barrett Adolescent Centre Commission of Inquiry - State representation

We refer to the Requirements to Produce Documents issued to Ms Fionnagh Dougan, Chief Executive of Children's Health Queensland Hospital and Health Service and to Ms Jane Yacopetti, Chair of the Children's Health Queensland Hospital and Health Service Board both dated 23 September 2015.

On the **enclosed** USB is a folder titled "*RTP- CHQHHS and Board*" containing the following documents for production:

Number	Document	Date	RTPD Reference
3.	Folder titled ' <i>Transition Arrangements</i> ' containing the following documents: <ol style="list-style-type: none"> 1. Statewide Adolescent Extended Treatment & Rehabilitation Implementation Strategy; 2. Metro North Request for Funds for [REDACTED]; 3. Quote for [REDACTED] Cairns; 4. AETRI Action Item Register; 5. AETRI and AMHETI Project Status Reports; 6. AETRI Steering Committee Meeting Agendas; 7. AETRI Steering Committee Minutes and 	Various	11,12,13,14

State Law Building
50 Ann Street Brisbane
GPO Box 5221 Brisbane
Queensland 4001 Australia
DX 40121 Brisbane Uptown
Telephone 07 3239 6703
Facsimile 07 3239 0407
ABN 13 846 673 994

Barrett Adolescent Centre Commission of Inquiry - State representation

Number	Document	Date	RTPD Reference
	Board Papers; 8. AETRI Terms of Reference; 9. All correspondence relating to BAC transition; 10. All documentation relating to patient transitions; 11. All documentation relating to Transition Investigation Report; 12. All Education Queensland communication relating to BAC transition; 13. BAC Holiday Day Program Budget; 14. CE DOH Oversight Committee Action Item Register; 15. CE DOH Oversight Committee Meeting Documentation; 16. CE DOH Oversight Committee Terms of Reference; 17. Presentation to parents on BAC transition; 18. SW AETR Project and Communication Plans; 19. SW AETR Risk Register; and 20. Youth Resi Committee Meeting Minutes and Actions.		
4.	Folder titled ' <i>Families of Clients</i> ' containing the following documents: 1. All correspondence to families of transition clients; and 2. All documentation relating to presentation from Parents 4 Nov 2013.	Various	12,15
5.	Folder titled ' <i>Staff of BAC</i> ' containing the following documents: 1. Pages from Workforce Planning Transition Working Group Agenda for the BAC Staff; and 2. Workforce Planning Transition Working Group Minutes for the BAC Staff.	Various	16
6.	Folder titled ' <i>Alternative to BAC</i> ' containing the following documents: 1. Alternatives to BAC All Correspondence; 2. Alternatives to BAC Workshop; 3. Alternatives to BAC Case Scenarios; 4. Alternatives to BAC International Research; 5. Alternatives to BAC National Mental Health Reform;	Various	17

Barrett Adolescent Centre Commission of Inquiry - State representation

Number	Document	Date	RTPD Reference
	6. Alternatives to BAC Research Articles; 7. Alternatives to BAC Research NSW; 8. Alternatives to BAC Research Qld; 9. Alternatives to BAC Services; 10. Alternatives to BAC VIC Clinician Visit; and 11. Alternatives to BAC VIC.		
7.	Folder titled ' <i>Other Matters</i> ' containing the following document: 1. All other matters minutes.	Various	7,16

This disclosure is partial disclosure in response to the above mentioned Notice.

Sensitive and Confidential Information

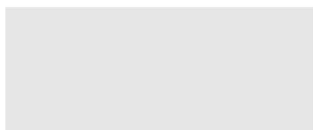
Please note, document 4.2 titled '*All documentation relating to presentation from Parents 4 Nov 2013*' contains confidential and sensitive information, including photographs, in relation to transition patients and their families. We have not sought or obtained consent for the disclosure of information about or from the families of transition patients. As such that information should not be published without the consent of the individuals. Further, we ask that the information contained in those documents regarding transition patients be treated as confidential subject to determination of the hearing on 15 October 2015 in relation to confidentiality orders.

Documents relating to consideration of 'alternative(s) for the replacement of the BAC'

The documents referred in tabs 3 and 6 above are documents that have been identified as relating to the consideration of alternatives for the replacement of the BAC. We have provided those documents on the understanding that the inquiry is focused on the identification of alternatives for the replacement of the BAC and is not concerned with the machinery of implementing any chosen alternative.

We will continue to produce documents as soon as practicable and will confirm full compliance upon receipt of instruction from our client that all relevant documents have been disclosed.

Yours sincerely



Louise Syme
 A/Assistant Crown Solicitor
 for **Crown Solicitor**
 encl

EXHIBIT B10



Queensland
Government

Crown Law

Department of
Justice and Attorney-General

Your ref:
Our ref: PLF/PRE052/2103/SZL
Contact: Louise Syme
Direct ph:
Direct fax:
Email:

2 November 2015

The Commissioner
Barrett Adolescent Centre Commission of Inquiry
Level 10, 179 North Quay
BRISBANE Q 4000

By email to:

Dear Commissioner

Barrett Adolescent Centre Commission of Inquiry - State representation

We refer to the Requirement to provide documents issued to Queensland Health on 14 September 2015, the Requirements to produce document issued to Department of Education and Training (DET), the Department of Housing and Public Works (HPW), Queensland Treasury, and the Department of the Premier and Cabinet on 15 September 2015 and the Requirements to produce documents to Children's Health Queensland Hospital and Health Service on 23 September 2015.

On 12 October 2015 I spoke with Ms Muir of Counsel Assisting about the continued production of documents in PDF text searchable format, which was not fully compliant with the Document Management Protocol. At that time I anticipated that Crown Law could produce documents compliant with the Document Management Protocol by 21 October 2015.

On 15 October 2015, Ms Muir confirmed that the Commission would prefer to receive the balance of documents in accordance with the Document Management Protocol. Ms Muir also recommended that I make further requests for extensions of time in writing.

Since 15 October 2015 Crown Law has continued to work towards providing documents in a format that complies with the Documents Management Protocol. On 15 October 2015 I sought an extension of time for Queensland Health to allow for compliance with a

State Law Building
50 Ann Street Brisbane
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Queensland 4001 Australia
DX 40121 Brisbane Uptown
Telephone 07 3239 6703
Facsimile 07 3239 0407
ABN 13 846 673 994

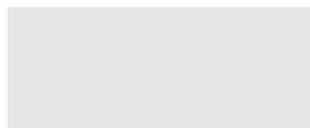
Barrett Adolescent Centre Commission of Inquiry - State representation

requirement issued to that department. At that time I should also have made a request for an extension of time on behalf of the recipients of the other requirements referred to above. I apologise for not making a timely requests for extensions of time that day.

Further to the Crown Solicitors letter to Mr Hill of the Commission today, on current information we hope that documents in a format that complies with the Document Management Protocol be disclosed at or before 4 pm Friday 6 November 2015. Accordingly we seek an extension of time until **4 pm Friday 6 November 2015** at which time we will provide a further update on our progress and seek further extensions of time as required.

We will continue to facilitate disclosure before that time if possible.

Yours sincerely



Louise Syme
Special Counsel
for **Crown Solicitor**

EXHIBIT B11



Queensland
Government

Crown Law

Department of
Justice and Attorney-General

Your ref:
Our ref: PL9/PRE052/2103/SZL
Contact: Louise Syme
Direct ph:
Direct fax:
Email:

28 September 2015

The Commissioner
Barrett Adolescent Centre Commission of Inquiry
Level 10, 179 North Quay
BRISBANE Q 4000
By hand

Dear Commissioner

Barrett Adolescent Centre Commission of Inquiry - State representation

I refer to the Requirement to Produce Documents issued to Mr Jim Watterston, Director-General of the Department of Education and Training dated 15 September 2015.

Please find **enclosed** a USB containing the following relevant documents:

Number	Document	Date	RTPD Reference
1.	Folder containing Staff files	Various	19(a)

Please note this disclosure amounts to partial compliance with the above mentioned Requirement to Produce. A request for an extension of time until **4pm on Friday 2 October 2015** has been made today.

We will continue to produce documents as soon as practicable and will confirm full compliance upon receipt of instruction from our client that all relevant documents have been disclosed.

Yours sincerely


Louise Syme
A/Assistant Crown Solicitor
for **Crown Solicitor**
encl

State Law Building
50 Ann Street Brisbane
GPO Box 5221 Brisbane
Queensland 4001 Australia
DX 40121 Brisbane Uptown
Telephone 07 3239 6703
Facsimile 07 3239 0407
ABN 13 846 673 994

EXHIBIT B12



Crown Law

Department of
Justice and Attorney-General

Your ref: 569995/1; 2997911
 Our ref: PL9/PRE052/2103/SZL
 Contact: Louise Syme
 Direct ph: [REDACTED]
 Direct fax: [REDACTED]
 Email: [REDACTED]

2 October 2015

The Commissioner
 Barrett Adolescent Centre Commission of Inquiry
 Level 10, 179 North Quay
 BRISBANE Q 4000

By Hand

Dear Commissioner

Barrett Adolescent Centre Commission of Inquiry - Notice 569995/1; 2997911

I refer to the Requirement to Produce Documents (Notice) issued by the Commissioner, The Honourable Margaret Wilson QC, to Mr Jim Watterson, Director-General, Department of Education and Training on 15 September 2015.

The following documents relevant to this Notice have been included on the **enclosed** USB.

Number	Documents	Date	RTPD Reference
1.	Files relating to students at the on-site integrated education program at the time of the Closure Decision (6 August 2013), detailed as follows: <ul style="list-style-type: none"> ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] 	Various	12

State Law Building
 50 Ann Street Brisbane
 GPO Box 5221 Brisbane
 Queensland 4001 Australia
 DX 40121 Brisbane Uptown
Telephone 07 3239 6703
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 ABN 13 846 673 994

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	▪			
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Please note this disclosure amounts to partial compliance with the above mentioned Requirement to Produce.

The enclosed student files are documents to which the Joint Submissions on Confidentiality made on 25 September 2015 relate. We ask that these documents be treated as confidential subject to a determination in relation to confidentiality as sought in those submissions.

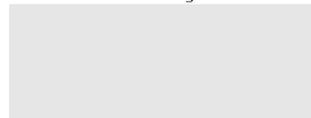
We have been informed by West Moreton Hospital and Health Service's legal representative that they have sought clarification from the Commission regarding individuals who fall within the definition of "transition clients". We have released the student files above on the understanding that there is no dispute that these patients were transition clients. We ask that the Commission confirm the name of any additional patients who fall within the definition of "transition clients" so that further appropriate disclosure may be made to the Commission.

Please note that personal information for individuals other than patients (including family members) has not been redacted from the disclosed documents to allow for ease of reading and context. However consent has not been obtained from those individuals for the disclosure of their personal information and those details should be redacted prior to any publication.

The Department seeks a further extension of time to produce documents relevant to the Notice. A large volume of documents has been provided to Crown Law in hard and soft copy form. Endeavours are continuing to provide those documents in text searchable PDF format and to undertake appropriate searching and consideration of the documents provided. The Department remains committed to providing all relevant documents in response to this Notice and requests a further extension of time until **4pm on Friday 9 October 2015** to provide those documents.

We will continue to produce documents as soon as practicable and will confirm full compliance upon receipt of instruction from our client that all relevant documents have been disclosed.

Yours sincerely



Louise Syme
A/Assistant Crown Solicitor
for **Crown Solicitor**

encl

EXHIBIT B13