

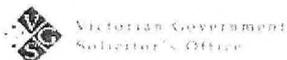
David Ryan/Users/VGSO
12/03/2010 09:19 AM

To Mark Waters <MWaters [REDACTED]>
cc
bcc rigipp [REDACTED], Steve
Smith/MELCENTRAL/VICPOLICE
Subject Re: Witness F

Mark

We have obtained instructions in relation to your email below. The Chief Commissioner will produce the redacted transcript to the Magistrates' Court this morning and argue that the redacted portions ought not be produced to the defence on ground of public interest immunity. However, regardless of the outcome of the argument, the Chief Commissioner will resist production of the redacted transcript to the defence until Monday. If the magistrate insists upon the redacted transcript being produced to the defence today, counsel for the Chief Commissioner will seek to have the matter stood down so that you can be contacted and you can seek to arrange for a representative to appear on behalf of your client to challenge the magistrate's ruling.

regards
David



David Ryan
Managing Principal Solicitor, Litigation Branch

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[david.ryan@\[REDACTED\]](mailto:david.ryan@[REDACTED])

www.vgso.vic.gov.au



Think Green before printing this email.

Mark Waters <MWaters [REDACTED]>



Mark Waters
<MWaters [REDACTED]>
[REDACTED]
12/03/2010 08:42 AM

To "david.ryan@[REDACTED]"
<david.ryan@[REDACTED]>
cc
Subject Witness F

Dear Mr Ryan

We refer to our discussions with you yesterday, 11 March 2010 and to our subsequent letter to you.

Notwithstanding that our client is in an acute hospital ward having undergone extensive and radical surgery yesterday afternoon, we have managed to obtain preliminary instructions as to some parts of the redacted transcript which your office proposes to release today, 12 March 2010.

In this regard, we are instructed to advise you that our client objects to the production of the transcript in its proposed form and has informed us that it is her belief that if the transcript is produced in its current form, this will lead to her being killed.

In the circumstances, we ask that you:

- (a) urgently convey our client's comments to Detective Sergeant O'Connell and Inspector Steve Smith and request that they both reconsider the redactions which are proposed to be made;
- (b) refrain from providing the redacted form of transcript to the Defence until we have had a chance to obtain our client's detailed instructions and convey her legitimate concerns to you.

However, in the event that your office is insistent upon providing the document to the Defence today, we ask that you notify us of your intention at least two hours prior to doing so in order that we may retain Counsel and seek an urgent injunction preventing the disclosure of the document so as to preserve our client's position (including her safety) whilst we obtain more detailed instructions.

Please acknowledge receipt of this email.

Yours Faithfully

Mark Waters

Partner

Piper Alderman

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