

Greg Elms/Users/VGSO
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To David Ryan/Users/VGSO@VGSO
cc luciabolka [REDACTED] Shaun
LeGrand/Users/VGSO@VGSO
bcc
Subject Fw: Paul Dale

Hi Dave,

As forecast and discussed last week, Hargreaves has now served a subpoena (their third) which mostly concerns witness F.

Items 1 and 2 of the schedule to that subpoena now clearly requires production of documents concerning "negotiations" for any benefit to F in relation to the Hodson murder investigation. Items 4, 5 and 6 may also cover documents held by your branch.

The items from the first subpoena concerning F that still need to be dealt with are:

- any document relevant to the proceedings which is in an informer management file - now also covered by item 3 of the new subpoena;
- the PII claims on the Davey questionnaire; and
- the PII claims on the O'Connell recorded interview.

Dot points two and three above do not seem to be covered by the new subpoena which is inconsistent with their correspondence to us which indicated that they now considered any part of the first subpoena as it relates to F to be set aside and they would be relying on the new subpoena - but they also told us this subpoena would be limited to documents concerning F and that also does not appear to be that case (ie items 7 to 15).

Can you please have a look at the subpoena to gauge the scope of documents which involve your branch and then I suggest we get together to discuss a coordinated response.

You will note that it is listed for return next Monday and, if possible, I'd like us to be able to instruct counsel to advise the court of our anticipated compliance timeframe and the scope of any arguments against disclosure.

Regards,
Greg



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