

*Apart from that, we confirm the availability of the documents set out in our client's further Affidavit and that we will make those documents available to you on the 4th February, 1999.*

*Please advise as to whether or not you are able to bring your client's discovered documents with you."*

Now produced and shown to me and marked **SME 12** is a true copy of that letter.

10. On 29 January 1999 I wrote to Baldock Satcy & Niven as follows:

*"We refer to your letter dated 28 January 1999.*

*We will be more than happy to bring up the documents referred to in our client's Affidavit of Documents for your client's inspection on 4 February 1999.*

*We look forward to meeting you at your office at about 1:30 p.m. on 4 February 1999."*

Now produced and shown to me and marked **SME 13** is a true copy of that letter.



11. On 4 February 1999 I attended at the offices of Baldock Stacy & Niven in Orange to inspect the documents discovered by the plaintiffs. I was taken to an upper floor in the building, and I believe that this was the third floor. I was taken to a room where there were two trestle tables covered with piles of papers. I was given to understand that these were the documents being discovered by the plaintiffs, and which I could inspect. On 4 and 5 February 1999 I carried out an inspection of approximately one quarter to one third of the documents produced, and all of the documents that I inspected were inspected in that room on the upper floor of the Baldock Stacy & Niven building. In total I inspected 12 piles of documents. I counted a total of approximately 29 piles of documents on the tables in that room.

12. During the time that I was inspecting the documents on 4 February 1999, the first named plaintiff brought to the room further documents for me to inspect. He also told me that there were some items not yet on the trestle tables and that he had a list of those further items, however I do not recall the first named plaintiff producing such a list to me. At about 4:30 p.m. on 4 February 1999 I spoke to the