

During the 1988 County Court proceeding I prepared numerous documents, amongst these were;

(a) a bound Book of Pleadings which is nothing more than a cut and paste of the various paragraphs of the Statement of Claim together with the the relevant paragraphs from the Council and Water Board's Amended Defence. Such a document is well known to Barristers and Solicitors.

(b) A ring binder containing notes and documents relevant to the proceeding. This document was a privileged document prepared for the purpose of briefing my then barrister, Fancis Tiernan and for the purpose of obtaining confidential legal advice from him.

From the material in the ring binder Francis Tiernan drafted the 1991 Amended Statement of Claim in the 1988 proceeding and his handwritten court notes and he had the ring binder and his handwrriten court notes in court for the hearing.

When Francis returned the folder to me his handwritten court notes were with it.

As described in Appendix "A" of the material at <http://courtsontrial.com> Major General Greg Garde's instructing solicitor, Steven Mark Edward, wrongly obtained a copy of my ring binder and for the purpose of validating his possession of it and wrongly exhibiting it he swore a false affidavit and combined it with a copy of the Book of Pleadings. Edward and Garde then corruptly described both documents as being a single document constituting the "Book of Pleadings" exhibited and relied upon by them.

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The Book of Pleadings and the Folder prepared by me for the purpose of seeking advice from Fancis Tiernan.

