

**2022 Special Commission of Inquiry
into LGBTIQ hate crimes**

**Before: The Commissioner,
The Honourable Justice John Sackar**

**At Level 2, 121 Macquarie Street,
Sydney, New South Wales**

On Friday, 5 May 2023 at 10am

(Day 49)

| | |
|-------------------------------|-----------------------------------|
| Mr Peter Gray SC | (Senior Counsel Assisting) |
| Ms Meg O'Brien | (Counsel Assisting) |
| Mr Enzo Camporeale | (Director Legal) |
| Ms Caitlin Healey-Nash | (Senior Solicitor) |
| Mr Rhys Carvosso | (Solicitor) |

Also Present:

**Mr Mark Tedeschi KC with Mr Anders Mykkeltvedt and
Ms Amber Richards for NSW Police**

**Mr Murugan Thangaraj SC with Mr Jonathan Milner for
Mr Willing**

1 THE COMMISSIONER: Yes, Mr Gray.

2

3 MR GRAY: Commissioner, the hearing that has been convened
4 for today is intended to have been for the conclusion of
5 the evidence of Mr Willing. Two topics in particular had
6 been foreshadowed as being the topics which would be
7 covered, one being what was referred to when Mr Willing was
8 in the witness box in February as the "suicide hypothesis",
9 which was one part of the content of a lengthy statement by
10 Detective Chief Inspector Pamela Young in the Scott Johnson
11 inquest; and the second topic foreshadowed concerned the
12 Lateline interview which Detective Chief Inspector Pamela
13 Young gave on the evening of 13 April 2015. That was the
14 day on which the State Coroner, Mr Barnes, determined that
15 there would be a third inquest into the death of Scott
16 Johnson.

17

18 A tender bundle of documents was prepared and served
19 on both those representing the Commissioner of Police and
20 those separately representing Mr Willing, the former Deputy
21 Commissioner of Police.

22

23 Between February and today, the Inquiry, through you,
24 Commissioner, issued a number of summonses, including
25 several to the NSW Police Force, seeking documents relevant
26 to one or both of those topics. Among the documents
27 produced were a large number of documents over which legal
28 professional privilege was claimed. That claim for legal
29 professional privilege seemed to those instructing me to be
30 legitimate, a proper claim of privilege, and so in
31 preparing the tender bundle, the Inquiry has not included
32 any of those documents over which a claim for legal
33 professional privilege was made, and those documents were
34 not going to be part of the evidence.

35

36 However, yesterday, the solicitors for Mr Willing
37 wrote to the Inquiry to say that their client, through
38 them, proposed and sought to waive legal professional
39 privilege over a total of five documents - I am corrected.
40 I'm told that the proposal was that Mr Willing's counsel
41 wished to have certain documents included in the tender
42 bundle, and it was requested that they be, in effect,
43 added, through me, and we were told that the NSW Police
44 Force, the holder of the privilege, would waive the
45 privilege. As to the last of those documents, that
46 information came through I think about 5 o'clock yesterday.

47

1 We have had the opportunity of really only this
2 morning to consider the material. It is immediately
3 apparent that although privilege has been waived over the
4 five documents, the documents themselves refer to other
5 documents, presumably, although I may be wrong about this,
6 themselves the subject of a claim for legal professional
7 privilege, and it would be likely, we apprehend, that those
8 documents themselves would no longer be covered by legal
9 professional privilege because that privilege would have
10 been waived.

11
12 In any event, whatever the legal detail may turn out
13 to be, the Inquiry is not in a position to proceed with the
14 evidence of Mr Willing today because there will need to be
15 time taken to understand what other documents may now need
16 to be assessed and included in the evidence. It will
17 therefore be our submission that the evidence of
18 Mr Willing, unfortunately, will not be able to go ahead
19 today and will have to be rescheduled, hopefully within the
20 next week or two.

21
22 THE COMMISSIONER: All right. Mr Tedeschi or
23 Mr Thangaraj?

24
25 MR TEDESCHI: May I suggest that Mr Thangaraj respond
26 first?

27
28 THE COMMISSIONER: Yes, certainly.

29
30 MR THANGARAJ: Commissioner, it's obviously extremely
31 disappointing at our end, because Mr Willing was hoping
32 that his evidence would be completed today. I understand
33 the difficulties that the Commission is in and obviously
34 don't wish to speak against it. There is nothing that can
35 be done.

36
37 The information that has been provided to us in recent
38 times that the Commission has recently received from
39 sources other than the police has been important and no
40 doubt will be part of Mr Willing's evidence in due course.

41
42 THE COMMISSIONER: I don't follow that. Are you talking
43 about documents in addition to those which (a) are in the
44 tender bundle --

45
46 MR THANGARAJ: No. They are all in the bundle, but they
47 are new documents. They are new to us over the last few

1 weeks, but they are very helpful documents to us.

2

3 THE COMMISSIONER: Yes.

4

5 MR THANGARAJ: All I ask is that we come back as soon as
6 possible. This will shift the - if the three-week
7 submission period is mandatory, then that will shift out
8 that date, and that currently, if required, the day that
9 I come back for oral arguments, is the last day I have
10 available for those few weeks. So I'm certainly happy to
11 put our submissions on - we don't need three weeks, but the
12 police probably do.

13

14 I don't know where that leaves us. Perhaps my friend
15 and I, Mr Tedeschi and our respectful people, can have
16 a chat with the Commissioner off the bench and we can try
17 to work out a timetable and get some available time as soon
18 as possible for Mr Willing to come back.

19

20 We can do Monday. I don't know if that is enough
21 time.

22

23 THE COMMISSIONER: No, it won't be enough time, quite
24 frankly, for this reason: as I understand it,
25 approximately 150 documents were the subject of legal
26 professional privilege. Although they were communicated
27 and supplied unredacted, unsurprisingly the Inquiry has
28 taken that claim seriously and they have been quarantined
29 in the sense that - for my own part and I suspect for some
30 others, perhaps not all, they have been quarantined in the
31 sense that we haven't taken them into account in terms of
32 looking at them for the purposes of things that Mr Willing
33 may be asked about.

34

35 MR THANGARAJ: Yes.

36

37 THE COMMISSIONER: Now, I'm not criticising what was said
38 in that regard, quite the opposite. But the effective
39 waiver at the last minute does raise, it seems to me,
40 questions about waiver more generally or waiver in respect
41 of other documents, and it does seem to me that a timetable
42 should be put in place. I have noted your availability.
43 I have noted Mr Tedeschi's. There is no wish on my part
44 to - and I am genuinely concerned about Mr Willing being
45 inconvenienced. However, there is the public interest
46 involved in this, and, more to the point, whatever
47 ultimately I'm going to receive by way of submissions about

1 Mr Willing, I want to make sure that whatever findings
2 I make are fairly to be made on any material that may be
3 before me, and I want to give everyone a proper opportunity
4 in order to ensure that that happens. However, I am
5 prepared to obviously take yours and Mr Tedeschi's and
6 Mr Mykkeltvedt's and others' availability into account and
7 do the best we can.

8
9 I have no interest - nobody has any interest - in
10 delaying this unduly. What I'm happy to do is to go off
11 the bench, if that's convenient. The first thing that will
12 need to be sorted out is whether what has happened has
13 waived any other documents that may currently be the
14 subject of claims, and if that needs to be determined, then
15 I'll determine it.

16
17 I look at the first page of one of the documents dated
18 24 April, and I see, "I have prepared dot points
19 summarising". Now, that may be a document in respect of
20 which there is a clear waiver. That may be conceded or it
21 may be necessary to make a determination about it. But I'm
22 happy to put something in place so that everyone knows what
23 the dates are.

24
25 I would wish, then, to accelerate, if there be any
26 argument at all, a determination of any waiver issues or
27 any concerns that may result in any of the documents.

28
29 MR THANGARAJ: As I said, Commissioner, I don't wish to
30 speak against anything that Mr Gray has just said. Of
31 course we understand that situation. The waiver issue is
32 not our privilege, so it's not something --

33
34 THE COMMISSIONER: Well, isn't it? Why isn't there either
35 a joint privilege --

36
37 MR THANGARAJ: Oh, yes, okay.

38
39 THE COMMISSIONER: So if there is a joint privilege, it
40 may be that there is absolutely no difference between the
41 two of you, in the sense that it may be impossible to
42 divide out a privilege of Mr Willing's on the one part,
43 given the role he was performing at the time, from that of
44 the police. But I just want to make sure that --

45
46 MR THANGARAJ: Yes, I understand.

47

1 THE COMMISSIONER: Any issues of privilege ought to be
2 ironed out ASAP. What about if I go off - if it is
3 convenient, I will go off the bench and enable counsel to
4 have discussions about a date to reconvene as soon as
5 possible in the next week or two. I'm not expecting any
6 further delay than that, because as you rightly point out,
7 it's going to affect submissions and other matters.

8
9 MR THANGARAJ: Yes.

10
11 THE COMMISSIONER: What about if I adjourn briefly. Why
12 doesn't somebody tell me when you are ready for me to come
13 back on.

14
15 MR THANGARAJ: Yes.

16
17 THE COMMISSIONER: All right. Thank you. I will adjourn.

18
19 **SHORT ADJOURNMENT**

20
21 THE COMMISSIONER: Yes.

22
23 MR GRAY: Thank you, Commissioner. I've spoken to all my
24 learned friends, and Monday, 15 May is convenient to all
25 parties for the adjourned date.

26
27 THE COMMISSIONER: All right. Okay.

28
29 MR GRAY: We will - that is to say the Inquiry will -
30 endeavour to write hopefully today to both the police and
31 Mr Willing's solicitors in respect of the privilege
32 question.

33
34 THE COMMISSIONER: All right. I will work on that basis
35 and - I'm sorry?

36
37 MR TEDESCHI: Commissioner, I won't be here because I'm
38 required elsewhere, but Mr Mykkeltvedt will represent the
39 Commissioner of Police.

40
41 THE COMMISSIONER: All right.

42
43 MR TEDESCHI: My learned friend has indicated he will tell
44 us which documents he feels are relevant to this part of
45 the inquiry, the examination of Mr Willing, and we will
46 then expedite any consideration of possible privilege
47 issues.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47

THE COMMISSIONER: All right. I will just leave with this message - no more surprises, either side, because I want to make sure that the evidence concludes. I've got an extension, as you now know, formally, but there is a fair bit to do, so I am anxious to ensure that that 15 May holds. All right. Thank you. I don't need to hear from you, I think. All right. I will now adjourn. Thank you.

AT 10.27AM THE SPECIAL COMMISSION OF INQUIRY WAS ADJOURNED ACCORDINGLY

1
10.27AM [1] - 3627:10
10am [1] - 3621:25
121 [1] - 3621:20
13 [1] - 3622:13
15 [2] - 3626:24,
 3627:6
150 [1] - 3624:25

2
2 [1] - 3621:20
2015 [1] - 3622:13
2022 [1] - 3621:9
2023 [1] - 3621:25
24 [1] - 3625:18

4
49 [1] - 3621:27

5
5 [2] - 3621:25,
 3622:46

A
able [1] - 3623:18
absolutely [1] -
 3625:40
accelerate [1] -
 3625:25
account [2] - 3624:31,
 3625:6
added [1] - 3622:43
addition [1] - 3623:43
adjourn [3] - 3626:11,
 3626:17, 3627:8
adjourned [1] -
 3626:25
affect [1] - 3626:7
ahead [1] - 3623:18
Amber [1] - 3621:39
Anders [1] - 3621:38
anxious [1] - 3627:6
apparent [1] - 3623:3
apprehend [1] -
 3623:7
April [2] - 3622:13,
 3625:18
argument [1] -
 3625:26
arguments [1] -
 3624:9
ASAP [1] - 3626:2
assessed [1] -
 3623:16
Assisting [2] -

3621:30, 3621:31
AT [1] - 3627:10
availability [2] -
 3624:42, 3625:6
available [2] -
 3624:10, 3624:17

B
Barnes [1] - 3622:14
basis [1] - 3626:34
bench [3] - 3624:16,
 3625:11, 3626:3
best [1] - 3625:7
between [2] - 3622:23,
 3625:40
bit [1] - 3627:6
box [1] - 3622:8
briefly [1] - 3626:11
bundle [5] - 3622:18,
 3622:31, 3622:42,
 3623:44, 3623:46

C
Caitlin [1] - 3621:33
Camporeale [1] -
 3621:32
Carvosso [1] -
 3621:34
certain [1] - 3622:41
certainly [2] -
 3623:28, 3624:10
chat [1] - 3624:16
Chief [2] - 3622:10,
 3622:12
claim [5] - 3622:28,
 3622:30, 3622:32,
 3623:6, 3624:28
claimed [1] - 3622:28
claims [1] - 3625:14
clear [1] - 3625:20
client [1] - 3622:37
Commission [3] -
 3621:9, 3623:33,
 3623:38
COMMISSION [1] -
 3627:10
Commissioner [11] -
 3621:15, 3622:3,
 3622:19, 3622:21,
 3622:24, 3623:30,
 3624:16, 3625:29,
 3626:23, 3626:37,
 3626:39
COMMISSIONER [17]
 - 3622:1, 3623:22,
 3623:28, 3623:42,
 3624:3, 3624:23,
 3624:37, 3625:34,

3625:39, 3626:1,
 3626:11, 3626:17,
 3626:21, 3626:27,
 3626:34, 3626:41,
 3627:2
communicated [1] -
 3624:26
completed [1] -
 3623:32
conceded [1] -
 3625:20
concerned [2] -
 3622:11, 3624:44
concerns [1] -
 3625:27
concludes [1] -
 3627:4
conclusion [1] -
 3622:4
consider [1] - 3623:2
consideration [1] -
 3626:46
content [1] - 3622:9
convened [1] - 3622:3
convenient [3] -
 3625:11, 3626:3,
 3626:24
Coroner [1] - 3622:14
corrected [1] -
 3622:39
Counsel [2] - 3621:30,
 3621:31
counsel [2] - 3622:40,
 3626:3
course [2] - 3623:40,
 3625:31
covered [2] - 3622:7,
 3623:8
crimes [1] - 3621:11
criticising [1] -
 3624:37

D
date [3] - 3624:8,
 3626:4, 3626:25
dated [1] - 3625:17
dates [1] - 3625:23
death [1] - 3622:15
delay [1] - 3626:6
delaying [1] - 3625:10
Deputy [1] - 3622:20
detail [1] - 3623:12
Detective [2] -
 3622:10, 3622:12
determination [2] -
 3625:21, 3625:26
determine [1] -
 3625:15
determined [2] -

3622:14, 3625:14
difference [1] -
 3625:40
difficulties [1] -
 3623:33
Director [1] - 3621:32
disappointing [1] -
 3623:31
discussions [1] -
 3626:4
divide [1] - 3625:42
document [1] -
 3625:19
documents [23] -
 3622:18, 3622:25,
 3622:26, 3622:27,
 3622:32, 3622:33,
 3622:39, 3622:41,
 3622:45, 3623:4,
 3623:5, 3623:8,
 3623:15, 3623:43,
 3623:47, 3624:1,
 3624:25, 3624:41,
 3625:13, 3625:17,
 3625:27, 3626:44
done [1] - 3623:35
dot [1] - 3625:18
doubt [1] - 3623:40
due [1] - 3623:40

E
effect [1] - 3622:42
effective [1] - 3624:38
either [2] - 3625:34,
 3627:3
elsewhere [1] -
 3626:38
enable [1] - 3626:3
end [1] - 3623:31
endeavour [1] -
 3626:30
ensure [2] - 3625:4,
 3627:6
Enzo [1] - 3621:32
evening [1] - 3622:13
event [1] - 3623:12
evidence [8] - 3622:5,
 3622:34, 3623:14,
 3623:16, 3623:17,
 3623:32, 3623:40,
 3627:4
examination [1] -
 3626:45
expecting [1] - 3626:5
expedite [1] - 3626:46
extension [1] - 3627:5
extremely [1] -
 3623:30

F
fair [1] - 3627:5
fairly [1] - 3625:2
February [2] - 3622:8,
 3622:23
few [2] - 3623:47,
 3624:10
findings [1] - 3625:1
first [3] - 3623:26,
 3625:11, 3625:17
five [2] - 3622:39,
 3623:4
follow [1] - 3623:42
Force [2] - 3622:25,
 3622:44
foreshadowed [2] -
 3622:6, 3622:11
formally [1] - 3627:5
former [1] - 3622:20
frankly [1] - 3624:24
Friday [1] - 3621:25
friend [2] - 3624:14,
 3626:43
friends [1] - 3626:24

G
generally [1] -
 3624:40
genuinely [1] -
 3624:44
given [1] - 3625:43
Gray [3] - 3621:30,
 3622:1, 3625:30
GRAY [3] - 3622:3,
 3626:23, 3626:29

H
happy [3] - 3624:10,
 3625:10, 3625:22
hate [1] - 3621:11
Healey [1] - 3621:33
Healey-Nash [1] -
 3621:33
hear [1] - 3627:7
hearing [1] - 3622:3
helpful [1] - 3624:1
holder [1] - 3622:44
holds [1] - 3627:7
Honourable [1] -
 3621:16
hopefully [2] -
 3623:19, 3626:30
hoping [1] - 3623:31
hypothesis [1] -
 3622:8

| | | | |
|---|---|---|--|
| <p style="text-align: center;">I</p> <hr/> <p>immediately [1] - 3623:2</p> <p>important [1] - 3623:39</p> <p>impossible [1] - 3625:41</p> <p>included [3] - 3622:31, 3622:41, 3623:16</p> <p>including [1] - 3622:24</p> <p>inconvenienced [1] - 3624:45</p> <p>indicated [1] - 3626:43</p> <p>information [2] - 3622:46, 3623:37</p> <p>inquest [2] - 3622:11, 3622:15</p> <p>Inquiry [7] - 3621:9, 3622:23, 3622:31, 3622:37, 3623:13, 3624:27, 3626:29</p> <p>inquiry [1] - 3626:45</p> <p>INQUIRY [1] - 3627:10</p> <p>Inspector [2] - 3622:10, 3622:12</p> <p>instructing [1] - 3622:29</p> <p>intended [1] - 3622:4</p> <p>interest [3] - 3624:45, 3625:9</p> <p>interview [1] - 3622:12</p> <p>involved [1] - 3624:46</p> <p>ironed [1] - 3626:2</p> <p>issue [1] - 3625:31</p> <p>issued [1] - 3622:24</p> <p>issues [3] - 3625:26, 3626:1, 3626:47</p> <hr/> <p style="text-align: center;">J</p> <hr/> <p>John [1] - 3621:16</p> <p>Johnson [2] - 3622:10, 3622:16</p> <p>joint [2] - 3625:35, 3625:39</p> <p>Jonathan [1] - 3621:41</p> <p>Justice [1] - 3621:16</p> <hr/> <p style="text-align: center;">K</p> <hr/> <p>KC [1] - 3621:38</p> <p>knows [1] - 3625:22</p> | <p style="text-align: center;">L</p> <hr/> <p>large [1] - 3622:27</p> <p>last [4] - 3622:45, 3623:47, 3624:9, 3624:39</p> <p>Lateline [1] - 3622:12</p> <p>learned [2] - 3626:24, 3626:43</p> <p>leave [1] - 3627:2</p> <p>leaves [1] - 3624:14</p> <p>legal [8] - 3622:27, 3622:28, 3622:32, 3622:38, 3623:6, 3623:8, 3623:12, 3624:25</p> <p>Legal [1] - 3621:32</p> <p>legitimate [1] - 3622:30</p> <p>lengthy [1] - 3622:9</p> <p>Level [1] - 3621:20</p> <p>LGBTIQ [1] - 3621:11</p> <p>likely [1] - 3623:7</p> <p>look [1] - 3625:17</p> <p>looking [1] - 3624:32</p> <hr/> <p style="text-align: center;">M</p> <hr/> <p>Macquarie [1] - 3621:20</p> <p>mandatory [1] - 3624:7</p> <p>Mark [1] - 3621:38</p> <p>material [2] - 3623:2, 3625:2</p> <p>matters [1] - 3626:7</p> <p>Meg [1] - 3621:31</p> <p>message [1] - 3627:3</p> <p>Milner [1] - 3621:41</p> <p>minute [1] - 3624:39</p> <p>Monday [2] - 3624:20, 3626:24</p> <p>morning [1] - 3623:2</p> <p>Murugan [1] - 3621:41</p> <p>Mykkeltvedt [2] - 3621:38, 3626:38</p> <p>Mykkeltvedt's [1] - 3625:6</p> <hr/> <p style="text-align: center;">N</p> <hr/> <p>Nash [1] - 3621:33</p> <p>necessary [1] - 3625:21</p> <p>need [5] - 3623:14, 3623:15, 3624:11, 3625:12, 3627:7</p> <p>needs [1] - 3625:14</p> <p>New [1] - 3621:21</p> <p>new [2] - 3623:47</p> | <p>next [2] - 3623:20, 3626:5</p> <p>nobody [1] - 3625:9</p> <p>noted [2] - 3624:42, 3624:43</p> <p>nothing [1] - 3623:34</p> <p>NSW [3] - 3621:39, 3622:25, 3622:43</p> <p>number [2] - 3622:24, 3622:27</p> <hr/> <p style="text-align: center;">O</p> <hr/> <p>O'Brien [1] - 3621:31</p> <p>o'clock [1] - 3622:46</p> <p>obviously [3] - 3623:30, 3623:33, 3625:5</p> <p>OF [1] - 3627:10</p> <p>one [5] - 3622:7, 3622:9, 3622:26, 3625:17, 3625:42</p> <p>opportunity [2] - 3623:1, 3625:3</p> <p>opposite [1] - 3624:38</p> <p>oral [1] - 3624:9</p> <p>order [1] - 3625:4</p> <p>others' [1] - 3625:6</p> <p>ought [1] - 3626:1</p> <p>own [1] - 3624:29</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p>page [1] - 3625:17</p> <p>Pamela [2] - 3622:10, 3622:12</p> <p>part [7] - 3622:9, 3622:34, 3623:40, 3624:29, 3624:43, 3625:42, 3626:44</p> <p>particular [1] - 3622:5</p> <p>parties [1] - 3626:25</p> <p>people [1] - 3624:15</p> <p>performing [1] - 3625:43</p> <p>perhaps [2] - 3624:14, 3624:30</p> <p>period [1] - 3624:7</p> <p>Peter [1] - 3621:30</p> <p>place [2] - 3624:42, 3625:22</p> <p>point [2] - 3624:46, 3626:6</p> <p>points [1] - 3625:18</p> <p>police [4] - 3623:39, 3624:12, 3625:44, 3626:30</p> <p>Police [6] - 3621:39, 3622:19, 3622:21, 3622:25, 3622:43, 3626:39</p> <p>position [1] - 3623:13</p> <p>possible [4] - 3624:6, 3624:18, 3626:5, 3626:46</p> <p>prepared [3] - 3622:18, 3625:5, 3625:18</p> <p>preparing [1] - 3622:31</p> <p>Present [1] - 3621:36</p> <p>presumably [1] - 3623:5</p> <p>privilege [19] - 3622:28, 3622:29, 3622:30, 3622:33, 3622:39, 3622:44, 3622:45, 3623:3, 3623:7, 3623:9, 3624:26, 3625:32, 3625:35, 3625:39, 3625:42, 3626:1, 3626:31, 3626:46</p> <p>proceed [1] - 3623:13</p> <p>produced [1] - 3622:27</p> <p>professional [7] - 3622:28, 3622:29, 3622:33, 3622:38, 3623:6, 3623:9, 3624:26</p> <p>proper [2] - 3622:30, 3625:3</p> <p>proposal [1] - 3622:40</p> <p>proposed [1] - 3622:38</p> <p>provided [1] - 3623:37</p> <p>public [1] - 3624:45</p> <p>purposes [1] - 3624:32</p> <p>put [3] - 3624:11, 3624:42, 3625:22</p> <hr/> <p style="text-align: center;">Q</p> <hr/> <p>quarantined [2] - 3624:28, 3624:30</p> <p>questions [1] - 3624:40</p> <p>quite [2] - 3624:23, 3624:38</p> <hr/> <p style="text-align: center;">R</p> <hr/> <p>raise [1] - 3624:39</p> <p>ready [1] - 3626:12</p> <p>really [1] - 3623:1</p> <p>reason [1] - 3624:24</p> <p>receive [1] - 3624:47</p> <p>received [1] - 3623:38</p> | <p>recent [1] - 3623:37</p> <p>recently [1] - 3623:38</p> <p>reconvene [1] - 3626:4</p> <p>refer [1] - 3623:4</p> <p>referred [1] - 3622:7</p> <p>regard [1] - 3624:38</p> <p>relevant [2] - 3622:25, 3626:44</p> <p>represent [1] - 3626:38</p> <p>representing [2] - 3622:19, 3622:20</p> <p>requested [1] - 3622:42</p> <p>required [2] - 3624:8, 3626:38</p> <p>rescheduled [1] - 3623:19</p> <p>respect [3] - 3624:40, 3625:19, 3626:31</p> <p>respectful [1] - 3624:15</p> <p>respond [1] - 3623:25</p> <p>result [1] - 3625:27</p> <p>Rhys [1] - 3621:34</p> <p>Richards [1] - 3621:39</p> <p>rightly [1] - 3626:6</p> <p>role [1] - 3625:43</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p>Sackar [1] - 3621:16</p> <p>SC [2] - 3621:30, 3621:41</p> <p>Scott [2] - 3622:10, 3622:15</p> <p>second [1] - 3622:11</p> <p>see [1] - 3625:18</p> <p>seeking [1] - 3622:25</p> <p>seem [1] - 3624:41</p> <p>Senior [2] - 3621:30, 3621:33</p> <p>sense [3] - 3624:29, 3624:31, 3625:41</p> <p>separately [1] - 3622:20</p> <p>seriously [1] - 3624:28</p> <p>served [1] - 3622:18</p> <p>several [1] - 3622:25</p> <p>shift [2] - 3624:6, 3624:7</p> <p>side [1] - 3627:3</p> <p>situation [1] - 3625:31</p> <p>Solicitor [2] - 3621:33, 3621:34</p> <p>solicitors [2] - 3622:36, 3626:31</p> <p>soon [3] - 3624:5,</p> |
|---|---|---|--|

3624:17, 3626:4
sorry [1] - 3626:35
sorted [1] - 3625:12
sought [1] - 3622:38
sources [1] - 3623:39
South [1] - 3621:21
SPECIAL [1] - 3627:10
Special [1] - 3621:9
spoken [1] - 3626:23
State [1] - 3622:14
statement [1] - 3622:9
Street [1] - 3621:20
subject [3] - 3623:6,
 3624:25, 3625:14
submission [2] -
 3623:17, 3624:7
submissions [3] -
 3624:11, 3624:47,
 3626:7
suggest [1] - 3623:25
suicide [1] - 3622:8
summarising [1] -
 3625:19
summons [1] -
 3622:24
supplied [1] - 3624:27
surprises [1] - 3627:3
suspect [1] - 3624:29
Sydney [1] - 3621:21

T

TEDESCHI [3] -
 3623:25, 3626:37,
 3626:43
Tedeschi [3] -
 3621:38, 3623:22,
 3624:15
Tedeschi's [2] -
 3624:43, 3625:5
tender [4] - 3622:18,
 3622:31, 3622:41,
 3623:44
terms [1] - 3624:31
THANGARAJ [9] -
 3623:30, 3623:46,
 3624:5, 3624:35,
 3625:29, 3625:37,
 3625:46, 3626:9,
 3626:15
Thangaraj [3] -
 3621:41, 3623:23,
 3623:25
themselves [3] -
 3623:4, 3623:6,
 3623:8
therefore [1] - 3623:17
they have [2] -
 3624:28, 3624:30
third [1] - 3622:15

three [2] - 3624:6,
 3624:11
three-week [1] -
 3624:6
timetable [2] -
 3624:17, 3624:41
today [6] - 3622:4,
 3622:23, 3623:14,
 3623:19, 3623:32,
 3626:30
topic [1] - 3622:11
topics [3] - 3622:5,
 3622:6, 3622:26
total [1] - 3622:39
try [1] - 3624:16
turn [1] - 3623:12
two [4] - 3622:5,
 3623:20, 3625:41,
 3626:5

U

ultimately [1] -
 3624:47
unduly [1] - 3625:10
unfortunately [1] -
 3623:18
unredacted [1] -
 3624:27
unsurprisingly [1] -
 3624:27

W

waive [2] - 3622:38,
 3622:44
waived [3] - 3623:3,
 3623:10, 3625:13
waiver [6] - 3624:39,
 3624:40, 3625:20,
 3625:26, 3625:31
Wales [1] - 3621:21
week [3] - 3623:20,
 3624:6, 3626:5
weeks [3] - 3624:1,
 3624:10, 3624:11
Willing [13] - 3621:42,
 3622:5, 3622:7,
 3622:20, 3622:36,
 3623:14, 3623:18,
 3623:31, 3624:18,
 3624:32, 3624:44,
 3625:1, 3626:45
Willing's [4] -
 3622:40, 3623:40,
 3625:42, 3626:31
wish [4] - 3623:34,
 3624:43, 3625:25,
 3625:29
wished [1] - 3622:41

witness [1] - 3622:8
write [1] - 3626:30
wrote [1] - 3622:37

Y

yesterday [2] -
 3622:36, 3622:46
Young [2] - 3622:10,
 3622:13