

MinterEllison

28 January 2020

Mr Adam Ockwell
Director, Compliance
Mr Scott May
Director Legal Services & General Counsel

Victorian Commission for Gambling and Liquor Regulation
Level 3, 12 Shelley Street
RICHMOND VIC 3121

Dear Messrs Ockwell and May

VCGLR China Investigation

We refer to our letter dated 15 January 2020.

The communications between Crown and WilmerHale in respect of which privilege has been waived are all annexures to witness statements which have been filed and served in the class action.

To give context to those communications, and generally for the assistance of the VCGLR in relation to the China investigation, Crown is prepared to produce the following documents:

- (a) Witness statement of Barry Felstead dated 17 December 2019;
- (b) Witness statement of Drew Stuart dated 17 December 2019;
- (c) Witness statement of Jane Pan dated 17 December 2019;
- (d) Witness statement of Jason O'Connor dated 17 December 2019;
- (e) Witness statement of Geoff Dixon dated 20 December 2019;
- (f) Witness statement of Michael Chen dated 12 December 2019;
- (g) Witness statement of Michael Johnston dated 17 December 2019;
- (h) Witness statement of Rowen Craigie dated 17 December 2019;
- (i) Witness statement of Rowena Danziger dated 17 December 2019;
- (j) Expert report of Professor Margaret Lewis dated 9 December 2019; and
- (k) Addendum to expert report of Professor Margaret Lewis dated 19 December 2019,

together with the various annexures to each of the witness statements from (a) to (i) above.

In order to formalise the basis for production of these documents, we ask that the VCGLR serve a s26 notice requiring them to be produced.

These documents will be produced by way of secure electronic file transfer. We will send a link following receipt of the s26 notice.



Some parts of the annexures to the witness statements (not communications between Crown and WilmerHale) are redacted, reflecting claims of legal professional privilege which Crown continues to maintain.

If you would like to discuss any aspect of this, please contact us or Josh Preston at Crown.

Yours faithfully

MinterEllison

A handwritten signature in blue ink, appearing to read 'R. Murphy', with a large, stylized flourish at the end.

Richard Murphy
Partner

Contact: Richard Murphy [REDACTED]

OUR REF: RDM 1047099