

SANFEAD ANDN SGIC

**OFFICE OF THE INFORMATION
COMMISSIONER (W.A.)**

**File Ref: 95111
Decision Ref: D00796**

Participants:

Terence John Sanfead
Complainant

- and -

State Government Insurance Commission
Respondent

DECISION AND REASONS FOR DECISION

FREEDOM OF INFORMATION - refusal of access - documents relating to a claim for damages against former employer - clause 3(1) - personal information about third parties - public interest factors for and against disclosure of personal information - clause 6(1) - deliberative processes - advice and opinion obtained and recorded for the purposes of the deliberative processes of the agency - whether contrary to the public interest to reveal deliberations of the agency - clause 7 - legal professional privilege - whether documents are confidential communications between a legal adviser and client for the sole purpose of giving or receiving legal advice - whether documents were brought into existence for the sole purpose of use in existing or anticipated litigation involving the agency - section 26 - documents either in the possession of the agency but cannot be found or do not exist - sufficiency of search - whether agency has taken reasonable steps to find documents - role of the Information Commissioner.

Freedom of Information Act 1992 (WA) ss.26, 68(1), 72(1)(b), 75(1), 102(3); Schedule 1 clause 3(1), 6(1), 7

Freedom of Information Act 1982 (Commonwealth) s.36(1)(a)

Re Waterford and Department of the Treasury (No 2)(1984) 5 ALD 588.

Re Read and Public Service Commissioner (16 February 1994, unreported).

Re Mineralogy Pty Ltd and Department for Resources Development (5 January 1996, unreported).

Grant v Downs (1976) 135 CLR 674.

Baker v Campbell (1983) 153 CLR 52.

Wheeler v Le Marchant (1881) 17 Ch D 675

Trade Practices Commission v Sterling (1979) 36 FLR 244

DECISION

The decision of the agency is varied. In substitution it is decided that:

- (i) the matter deleted from the documents described in the schedule attached to this decision, is exempt matter under clause 3(1) of Schedule 1 to the *Freedom of Information Act 1992*;
- (ii) Documents 357, 406-408, 420-421 and 445 are not exempt under clause 6(1) of Schedule 1 to the the *Freedom of Information Act 1992*; and
- (iii) the documents or parts of documents referred to in paragraphs 42-44 of this decision are exempt under clause 7 of Schedule 1 to the *Freedom of Information Act 1992*.

B. KEIGHLEY-GERARDY
INFORMATION COMMISSIONER

17th January 1996

REASONS FOR DECISION

1. This is an application for external review by the Information Commissioner arising out of a decision of the State Government Insurance Commission ('the agency') to refuse Mr Sanfead ('the complainant') access to certain documents requested by him under the *Freedom of Information Act 1992* ('the FOI Act').

BACKGROUND

2. The background to this complaint is as follows. In 1986 the complainant was seriously injured in an industrial accident. Although the complainant received worker's compensation payments for his injuries, he was unable to resume employment. In 1990 the complainant instituted proceedings in the District Court of Western Australia in which he alleged that his former employer was negligent and he sought damages in respect of his injuries allegedly attributed to that negligence. Two other defendants were later joined as parties to that action. In April 1994, the District Court determined the matter in favour of the three respondents and the complainant (the plaintiff) received no compensation for his disabilities.
3. On 12 April 1995, the complainant applied to the agency under the FOI Act for access to his entire file which involved in excess of 850 documents. The agency granted the complainant access to the majority of those documents. However, the agency refused access to 164 documents on the ground that those documents were exempt, either in full or in part, under one or more of clauses 3(1), 6 and 7 of Schedule 1 to the FOI Act.
4. The complainant sought internal review of the agency's decision. On 9 June 1995, Mr V Evans, the principal officer and Managing Director of the agency, confirmed the agency's initial decision that the documents, or parts of documents to which access had been refused, were exempt, although Mr Evans granted the complainant access to one additional document.
5. On 16 June 1995, the complainant applied to the Information Commissioner for external review of the agency's decision to refuse him access to the requested documents. In addition, the complainant stated that he believed that certain documents were "missing" from the agency's files. Accordingly, his complaint to the Information Commissioner included a complaint about the sufficiency of the searches conducted by the agency to locate all documents that came within the ambit of his access application.
6. The complainant has appealed against the decision of the District Court. That appeal was heard by the Supreme Court of Western Australia on 11 August 1995. However, to my knowledge, the decision of the Supreme Court on his appeal has not yet been delivered by the Court.

REVIEW BY THE INFORMATION COMMISSIONER

7. On 23 June 1995, in accordance with my obligations under s.68(1) of the FOI Act, I notified the agency that I had received this complaint. Pursuant to my authority under s.75(1) and s.72.(1)(b) of the FOI Act, I also sought the production to me of the originals of the documents in dispute, together with the agency's FOI file maintained in respect of this matter. I also required the agency to provide further reasons to justify the refusal of access, including findings on material questions of fact and the material on which those findings were based.
8. Conciliation was attempted between the parties by my investigations officer and, prior to a preliminary conference between the parties organised by my office, the complainant provided evidence that some third parties consented to the disclosure of their personal information to him. As a result, the agency withdrew its claims under clause 3(1) in respect of those parts of the disputed documents which referred to those third parties, and released copies of those documents to the complainant. At the conclusion of that process, 162 documents remained in dispute between the parties.
9. After examining those documents and considering the material provided by the parties, on 12 September 1995, I provided the parties with my preliminary view and reasons for that view. It was my preliminary view that the matter deleted from 12 of the disputed documents was, *prima facie*, exempt matter under clause 3(1); 3 documents for which an exemption was claimed under clause 6(1) were not exempt under that clause; and that most, but not all, of the 148 documents for which an exemption under clause 7 was claimed, were exempt under that clause.
10. After receiving my preliminary view, the agency released a further 12 documents in full to the complainant and provided him with access to edited copies of 3 others. The agency also provided my office with further information to support its claims that some of the disputed documents which, in my preliminary view, were not exempt under clause 7, were exempt under clause 7 of Schedule 1 to the FOI Act. After considering that additional material, I was satisfied that the agency's claims for exemption under clause 7 were, in the main, correct. However, on 5 January 1996, the agency agreed to release 5 more documents in full and part of one other document to the complainant.
11. I twice invited the complainant to reconsider his complaint, in light of my preliminary view. I also invited him to provide additional submissions in response to the additional information provided by the agency. The complainant made no concessions during the conciliation process and, despite the efforts of my office to assist him with his complaint, he insisted upon a formal decision in respect of this matter. At the conclusion, 150 documents, or parts of documents remain in dispute between the parties. From the material before me, the position of the complainant with respect to the sufficiency of the searches conducted by the agency, is unclear. Therefore, this decision concerns two issues, namely, the exempt status or otherwise of the disputed documents, and the sufficiency of searches conducted by the agency. I intend to deal with the search issue first.

Sufficiency of searches

12. At the preliminary conference organised by one of my officers, the complainant stated that he believed the agency had failed to provide him with all documents relating to his claim, in particular, he sought access to a copy of a statement taken from a particular witness, his work reports, daily running sheets and a report from the then State Energy Commission of Western Australia (SECWA) (now Western Power) about its investigation of the complainant's accident.
13. When the agency produced the disputed documents to my office, in accordance with the notice issued under s.75(1) of the FOI Act, copies of those documents were carefully checked and verified by one of my officers. I am informed by that officer that the agency's files appeared to be in complete chronological order and that there does not appear to be any gaps in the numbered folios, nor any other evidence to indicate that documents have been removed from the files.
14. The complainant was given the opportunity to inspect the agency's files in the first instance. Prior to allowing the complainant to inspect his files at the agency, the agency temporarily removed the documents claimed to be exempt. However, when the files were produced to me, the exempt documents had been returned to the files concerned and were examined by me. The matter of documents allegedly "missing" from the agency's files was not raised by the complainant when he applied for internal review. The complainant later informed my investigations officer that he now believes the particular witness concerned did not provide a statement to the agency. Further, he obtained copies of his daily work running sheets from another agency after inquiries made by my office. However, the complainant believes that the agency holds a copy of the SECWA report and that he has been denied access to that report, in spite of the fact that he has obtained a copy of that document from another source.
15. Section 26 of the FOI Act deals with the requirements of an agency in circumstances in which it is unable to locate the documents sought by an access applicant. That section provides as follows:

"26. (1) The agency may advise the applicant, by written notice, that it is not possible to give access to a document if -

(a) all reasonable steps have been taken to find the document; and

(b) the agency is satisfied that the document -

(i) is in the agency's possession but cannot be found;

or

(ii) does not exist.

(2) For the purposes of this Act the sending of a notice under subsection (1) in relation to a document is to be regarded as a decision to refuse access to the document, and on a review or appeal under Part 4 the agency may be required to conduct further searches for the document."

16. There are two questions that must be answered whenever allegations are made concerning "missing" documents. Firstly, are there reasonable grounds to believe that the documents exist? Secondly, in circumstances in which the first question is answered in the affirmative, were the searches conducted by the agency to locate the documents reasonable in all the circumstances?
17. I do not consider that it is my function to physically search for the requested documents on behalf of an applicant, nor is it my function to examine in detail the manner in which an agency organises or maintains its records. However, if I am satisfied that documents exist, or might exist in an agency, it is my responsibility to inquire into the adequacy of the searches conducted by an agency and to require further searches if necessary, to satisfy myself that the agency has acted reasonably and according to its obligations under the FOI Act.
18. Although I am satisfied that the SECWA report exists, in July 1990 at the time of its creation, it was confidential and SECWA would not release a copy of that report to the agency or to its insurance investigators. However, the report was subsequently inspected by the agency's solicitors and it was produced in the District Court under subpoena, in 1994. In those circumstances, I consider it unlikely that the agency held a copy of that document, as claimed by the complainant.
19. In this instance, the complainant provided no material to justify his claim that further documents exist which have not been identified by the agency. For the reasons given in paragraphs 13 and 14 above, I am satisfied that the agency made a reasonable effort to identify all the documents held by it that came within the ambit of the complainant's access application. Accordingly, I did not consider it necessary to require the agency to conduct any further searches. In respect of the part of the complaint concerning the sufficiency of searches, I find that the agency's actions were reasonable and that the agency dealt with the complainant's access application pursuant to its obligations under the FOI Act.

THE DISPUTED DOCUMENTS

20. There are 136 documents remaining in dispute which the agency claims are exempt, either in full or in part, under clause 7 of Schedule 1 to the FOI Act. Those documents consist of correspondence between the agency and the Crown Solicitor's Office ('the CSO'); hand-written notes passing between officers of the agency; copies of correspondence between the CSO and the solicitors representing the second and third defendants to the complainant's claim for damages heard by the District Court in 1994; a copy of an opinion from a

Queen's Counsel; and various administrative documents which contain or record the legal advice given to the agency.

21. There are also 7 documents being Documents 445, 420-421, 406-408 and part of Document 357 which are claimed to be exempt under clause 6(1) of Schedule 1 to the FOI Act. Document 445 is a file note dated 20 April 1994. Documents 420-421 comprise hand-written notes of an informal conference attended by solicitors representing the three defendants to the complainant's claim for damages. Documents 406-408 are hand-written file notes containing a summary of the history of the complainant's claim.
22. There are 15 documents for which exemption is claimed under clause 3(1) of Schedule 1 to the FOI Act for matter deleted from those documents. I am satisfied that all documents in dispute have been adequately described in a schedule prepared by the agency, a copy of which was provided to the complainant at the time he was given the agency's decision on internal review. I intend to refer to the documents in this decision using the same identification numbers that appear on the schedule prepared by the agency.

THE EXEMPTIONS

(a) Clause 3 - Personal information

23. Clause 3, so far as is relevant provides:

“3. *Personal information*

Exemption

(1) Matter is exempt matter if its disclosure would reveal personal information about an individual (whether living or dead).”

24. In the Glossary in Schedule 2 to the FOI Act, "**personal information**" is defined as meaning "...*information or an opinion, whether true or not, and whether recorded in a material form or not, about an individual, whether living or dead-*
 - (a) *whose identity is apparent or can reasonably be ascertained from the information or opinion; or*
 - (b) *who can be identified by reference to an identification number or other identifying particular such as a fingerprint, retina print or body sample."*

25. The exemption in clause 3(1), in my view, is designed to protect the privacy of third parties whose personal information may be contained in documents held by government agencies. Personal information is not generally accessible under the FOI Act by others, without the consent of the person to whom the information relates. As such, it is an exception to the “general” right of access to documents which is available to everyone under the FOI Act.
26. I have examined the documents in dispute and the matter that the agency has deleted from the copies of the documents to which access has been granted to the complainant. The deleted matter consists of names of third parties and other identifying material that is, in my view, *prima facie*, exempt matter under clause 3(1). The onus of persuading me that the disclosure of personal information would, on balance, be in the public interest, rests with the complainant under s.102(3) of the FOI Act.
27. Although the complainant initially established that two third parties consented to their personal information being disclosed to the complainant, no submissions were received from the complainant about the remaining matter deleted from the documents by the agency. In my view, the complainant has made no attempt to satisfy the onus of persuading me that disclosure of that matter would, on balance, be in the public interest.
28. I have previously said, on a number of occasions in my formal decisions that I recognise that there is a public interest in maintaining the personal privacy of third parties. I also recognise that there is a public interest in the complainant being able to exercise his right of access under the FOI Act. In this instance, I am not persuaded that the latter interest is sufficiently strong to outweigh the former, especially in the absence of any material to the contrary. In my view, the agency correctly deleted personal information about third parties from the disputed documents. Accordingly, I find the matter deleted from documents 70, 116, 117, 264, 266, 401, 413, 448, 449, 450, 458, 736, 737, 743 and 746 is exempt matter under clause 3(1) of Schedule 1 to the FOI Act. That exempt matter is described in the schedule attached to this decision.

(b) Clause 6 - Deliberative processes

29. Clause 6, so far as is relevant provides:

"6. *Deliberative processes*

Exemptions

(1) Matter is exempt matter if its disclosure -

(a) would reveal -

(i) any opinion, advice or recommendation that has been obtained, prepared or recorded; or

(ii) *any consultation or deliberation that has taken place, in the course of, or for the purpose of, the deliberative processes of the Government, a Minister or an agency;*

and

(b) *would, on balance, be contrary to the public interest."*

30. To establish an exemption under clause 6, the agency must satisfy the requirements of both paragraphs (a) and (b) of that exemption. If a disputed document contains matter of a type described in paragraph (a), then it is necessary to consider the requirements of paragraph (b), that is, whether disclosure of the document would, on balance, be contrary to the public interest.
31. As I have said before, the key words in clause 6(1)(a) are the "*deliberative processes...of an agency*". The meaning of the phrase "deliberative processes" has been considered in a number of cases based on the equivalent section in the Commonwealth *Freedom of Information Act 1982* (s.36(1)(a)). I have also discussed the meaning and purpose of the exemption in clause 6(1) in a number of my formal decisions. In my view, the following passage in *Re Waterford and Department of the Treasury (No 2)* (1984) 5 ALD 588 in relation to the equivalent Commonwealth provision applies to a consideration of clause 6(1) of the FOI Act in Western Australia and the meaning of the words "deliberative processes". In that case, the Commonwealth Administrative Appeals Tribunal said, at paragraphs 58-60:

"58. As a matter of ordinary English the expression 'deliberative processes' appears to us to be wide enough to include any of the processes of deliberation or consideration involved in the functions of an agency. "Deliberation" means "the action of deliberating; careful consideration with a view to decision": see the Shorter Oxford English Dictionary. The action of deliberating, in common understanding, involves the weighing up or evaluation of the competing arguments or considerations that may have a bearing upon one's course of action. In short, the deliberative processes involved in the functions of an agency are its thinking processes - the processes of reflection, for example, upon the wisdom and expediency of a proposal, a particular decision or a course of action. Deliberations on policy matters undoubtedly come within this broad description. Only to the extent that a document may disclose matter in the nature of or relating to deliberative processes does s.36(1)(a) come into play...

59. It by no means follows, therefore, that every document on a departmental file will fall into this category...Furthermore, however imprecise the dividing line may first appear in some cases, documents disclosing deliberative processes must, in our view, be distinguished from

documents dealing with the purely procedural or administrative processes involved in the functions of the agency...

60. It is documents containing opinion, advice, recommendations etc. relating to the internal processes of deliberation that are potentially shielded from disclosure...Out of that broad class of documents, exemption under s.36 only attaches to those documents the disclosure of which is 'contrary to the public interest'..."

32. I accept that statement as a correct explanation of the meaning of the exemption in clause 6 in Western Australia. Further, I consider that the exemption in clause 6 is designed to protect the "thinking processes" of an agency so that the integrity of those processes, especially in circumstances where deliberations have not concluded, are not jeopardised by the disclosure of documents. However, once the deliberative process is complete, in my view, different considerations apply.
33. I have examined Documents 445, 406-408, 420-421 and Document 357. I am not satisfied that those documents contain information of a type described in paragraph (a) of clause 6(1). Document 445 is a file note. The agency claims that it records the contents of a conversation between officers of the agency and clearly demonstrates the deliberative processes of the agency and its decision as to the course of action to take to best resolve the complainant's claim.
34. In my view, Document 445 is nothing more than a file note. I consider it is an administrative document only and discloses nothing about the "thinking processes" of the agency, nor does it reveal any of the weighing up of competing options that normally characterise the type of matter that is truly deliberative in the sense described in *Re Waterford*. In any case, as the agency's deliberations concerning the complainant have presumably been finalised following the complainant's appeal to the Supreme Court, I do not consider, on balance, that it would be contrary to the public interest to disclose this document to the complainant. Accordingly, I find that Document 445 is not exempt under clause 6(1) of Schedule 1 to the FOI Act.
35. In my view, and for similar reasons, Documents 420-421 are documents of an administrative nature and not deliberative process documents. Those documents do not disclose any of the thinking processes of the agency. In any case, and for the reasons given in paragraph 34 above, I do not consider, on balance, that it would be contrary to the public interest to disclose most of Documents 420-421 to the complainant and I find that they are not exempt under clause 6(1). However, the agency also claims that those documents are exempt under clause 7. I have considered this aspect of the agency's claims at paragraphs 38-44 below.
36. Documents 406-408 in my view, are also administrative documents. They contain a summary of the history of the complainant's claim. Whilst there may be some matter in those documents that could be described as advice or opinion, I am not satisfied that it was obtained or recorded in the course of, or for the

deliberative purposes of the agency. The documents are not addressed to anyone, nor are they signed. The agency informed me that Documents 406-408 were prepared by an officer of the agency, but I was not informed about the reason for their creation. The documents themselves do not appear to have been created officially for any purpose, and certainly not for the deliberative processes of the agency. There is nothing in those documents to suggest that a decision was required to be made about particular matters, nor do they contain any evidence of a consideration about some matter requiring a decision to be made by the agency. Therefore, I am not satisfied that Documents 406-408 are of a type described in paragraph (a) of clause 6(1) and, accordingly, I find that they are not exempt under clause 6(1). The agency also claims certain matter within Documents 406-408 is exempt matter under clause 7 of Schedule 1 to the FOI Act. I have dealt with that aspect of the agency's claims at paragraphs 38-44 below.

37. In my view, Document 357 is correctly described as a file note. I consider it to be an administrative document and not a deliberative process document, because it does not disclose any evidence of any act of deliberating upon a course of action or weighing up of options. In my view, the exemption in clause 6 does not apply to file notes and the like, unless there is some decision that is required to be made in respect of the matters in such documents, and only when the decision is truly a part of the deliberative processes of the agency in the sense described in *Re Waterford*, and not merely a routine administrative step taken by an agency as part of its usual functions: see also my comments on this point in my decision *Re Read and Public Service Commission* (16 February 1994, unreported), at paragraph 26. Therefore, I find that Document 357 is not exempt under clause 6(1). The agency also claims that one paragraph in Document 357 is exempt under clause 7. I have dealt with that claim in paragraphs 38-44 below.

(c) **Clause 7 - Legal professional privilege**

38. Clause 7 of Schedule 1 to the FOI Act provides:

"Legal professional privilege

Exemption

- (1) *Matter is exempt matter if it would be privileged from production in legal proceedings on the ground of legal professional privilege.*

Limit on exemption

- (2) *Matter that appears in an internal manual of an agency is not exempt matter under subclause (1)."*

39. In a number of my formal decisions, I have discussed the principle and application of legal professional privilege, initially in *Re Read and Public Service*

Commission (16 February 1994, unreported), at paragraphs 65-66, and most recently in *Re Mineralogy Pty Ltd and Department for Resources Development* (5 January 1996, unreported), at paragraphs 32-34.

40. It is clearly established law in Australia that confidential communications passing between a legal adviser and his or her client need not be given in evidence or otherwise disclosed by the client and, without the client's consent, may not be given in evidence or otherwise disclosed by the legal adviser, if made for the sole purpose of enabling the client to obtain, or the adviser to give, legal advice or for use in existing or anticipated legal proceedings: *Grant v Downs* (1976) 135 CLR 674; *Baker v Campbell* (1983) 153 CLR 52. Confidential communications between a solicitor or client and a third party will also be privileged if they are made for the purpose of actual or anticipated litigation: *Wheeler v Le Marchant* (1881) 17 Ch D 675; *Trade Practices Commission v Sterling* (1979) 36 FLR 244.
41. The agency claims that 136 of the disputed documents would be privileged from production in legal proceedings on the ground of legal professional privilege, because those documents consist of, among other things, correspondence between the agency and its legal advisers, the CSO; correspondence between one or more of the legal firms or Counsel representing each of the three defendants involved in the complainant's civil action before the District and Supreme Courts; confidential communications between the agency and a third party brought into existence for the sole purpose of preparing for existing or anticipated litigation; notes, memoranda, minutes of meetings and other administrative documents that record the substance of communications and advice from the agency's legal advisers.
42. I have examined each of the documents, or parts of documents, for which an exemption under clause 7 is claimed by the agency. From my examination of those documents and from the material provided to me by the agency, I am satisfied that those documents and parts of documents, would be privileged from production in legal proceedings on the ground of legal professional privilege. Documents 81, 92, 100, 119, 120, 122, 127, 131, 136, 145, 147, 167, 178, 180, 182, 184, 185, 187, 190, 191, 193-195, 202, 235, 236, 250, 251, 256, 268, 269, 274, 276, 289, 294, 295, 297, 303, 306, 311, 313, 316, 318, 326, 328, 331, 335, 338, 341, 344-346, 349, 355, 356, 359, 364-367, 370, 374, 381-384, 394, 400, 402, 405, 416, 419-422, 424, 427, 428, 430, 433-437, 440-441, 443, 446, 447, 451, 453-456, 460-465, 468, 470-474, 478-481, 483, 489, 490, 720, 722, 738, 739 and 740 consist of correspondence between the agency and the CSO in respect of the complainant's claims for workers compensation and his subsequent common law claim for damages and notes, memoranda or minutes of meetings and telephone conversations between officers of the agency and solicitors from the CSO in respect of those matters. Accordingly, I find that those documents are exempt under clause 7 of Schedule 1 to the FOI Act.
43. Documents 391, 423, 429, 431, 432, 439, 476 and 477 consist of confidential communications between the agency or the CSO and the solicitors representing

the second and third defendants, which were clearly brought into existence for the sole purpose of use in existing or anticipated litigation involving the agency and the complainant. Document 156 is a confidential communication from the agency to its insurance investigators about the complainant's workers compensation claim. Accordingly, I find those documents are exempt under clause 7 of Schedule 1 to the FOI Act.

44. Finally, the agency claims that parts of several of the disputed documents contain records of telephone conversations between officers of the agency and the CSO, and the nature of the advice received from the CSO. In my view, those parts of the documents which record those discussions and the substance of the advice received from the CSO in respect of the complainant's claims are clearly exempt under clause 7 of Schedule 1 to the FOI Act. Accordingly, I find that the parts of the following documents are exempt under clause 7:

Document 229 - the first 9 lines;

Document 275 - the first full paragraph under the name "Edwina";

Document 348- lines 8-13 inclusive;

Document 357 - lines 10-12 inclusive;

Document 406 - the entries beside the dates "10.1.91", "20.1.92" , "7.5.93" and the first paragraph under the heading "Conclusion";

Document 407 - the first line;

Document 408 - the entries beside the dates "16.10.89" and "4.4.90"; and

Document 459 - the first full paragraph.

SCHEDULE OF MATTER EXEMPT UNDER CLAUSE 3

Document 70	page 1	paragraph 2	4th-10th words, inclusive.
	page 2	paragraph 6	2nd and 3rd words
		paragraph 7	the name appearing in lines 9 and 10
		paragraph 8	the name appearing in line 1
		paragraph 9	the name appearing in line 1
	page 7	statutory declaration	the name and address in lines 1 and 2 all text of lines 4-13, inclusive all text of lines 20-21, inclusive
	page 8	statutory declaration	the name of the signatory
Document 116	page 1		the name and address in lines 1 and 2 all text of lines 4-8, inclusive first 6 words of line 9
	page 2		the name of the signatory
Document 117	page 1	paragraph 1	line 2, all text
	page 1		third parties names, wherever occurring
	page 2		third parties names, wherever occurring
Document 264		paragraph 1	third parties names appearing in lines 7, 14, 16 and 17
Document 266			Line 9, first 5 words Line 14, third party name line 16, 4th-10th words, inclusive
Document 401	page 2		heading to paragraph 4 - third party name
		paragraph 4	line 3, 1st word line 5, all text line 8, 4th word line 11, 2nd word line 13, 8th and 9th words one 23, 7th word one 24, last 4 words
	page 4	under the heading "Conclusion"- paragraph 1	line 2, third party name
		under the heading "Conclusion"- paragraph 3	lines 2 and 5, third party name
	page 7	statement page 1	lines 1, 2 and 3 lines 5, 9th and 10th words line 8, 5th and 6th words line 9, all text line 10, first word line 11, 5th-11th words, inclusive line 12, all text line 14, 2nd-9th words, inclusive
	page 8		line 1, all text line 9, first six words
	page 12	addresses	first name and address

Document 413	page 1		line 1, all text line 3, 11th and 12th words line 4, 7th-10th words, inclusive line 6, 8th-10th words, inclusive line 7, 1st-14th words, inclusive line 9, 3rd-9th words, inclusive line 11, 2nd-9th words, inclusive line 27, 6th-12th words, inclusive
	page 2		the signature and place of signing
Document 448			line 1, 4th and 5th words line 2, last word line 3, first word
Document 449	page 1		the third party's name, signature and address, wherever occurring
Document 450	page 1		the third party's name and address, wherever occurring
Document 458	page 1		line 1, 1st and 2nd words line 2, 3rd, 4th and 8th words line 4, 2nd-6th words, inclusive line 5, 4th and 5th words line 6, 7th and 8th words line 8, 3rd and last words line 11, 3rd and 7th words
Document 736	page 1		line 1, third party's name and telephone number line 3, last 2 words
Document 737	page 1		third party's name, wherever occurring
Document 743	page 1		all third party names, other than the name of the complainant
Document 746	page 1		all third party names, other than the name of the complainant