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22 March 2021

Mr Craig Phillips and Ms Abigail Gill  
The Solicitors Assisting the Royal Commission  
Into the Casino Operator and Licence  
Level 25, 567 Collins Street  
Melbourne VIC 3000

Dear Mr Phillips and Ms Gill

**Royal Commission into the suitability of  
Crown Melbourne Limited to hold a Casino Licence**


We refer to our discussion on 18 March 2021 and to the further letter from the Commissioner to Crown Melbourne Limited (**Crown Melbourne**) dated 10 March 2021 requesting certain information by no later than 24 March 2021.


The information sought in that letter is broad. Given the breadth of the Commission's enquiries and our firm's recent engagement, Crown Melbourne will need to analyse a wide range of documents in order to answer the Commission's information request and is not in a position to respond comprehensively to the Commissioner's request by 24 March 2021. Crown Melbourne will, however, provide an initial response by 24 March 2021. Crown Melbourne will supplement that initial response with further responses following additional searches for, and analysis of, relevant documents (many, if not most, of which will be produced in response to one or more Notices to Produce).

Crown Melbourne also notes that, in respect of some breaches of the applicable legislation, and some reporting, a response is likely to be voluminous and unlikely to be of particular assistance to the Commission. In these cases, Crown Melbourne proposes to provide general or categorised descriptions of some of the breaches and reporting in its responses to the Commission, but will supplement those general or categorised responses should the Commission request it do so.

Please contact Andrew Maher, Belinda Thompson or Matthew McCarthy should you have any questions or concerns about this approach. We are also available to discuss how the tranches of responses might be sequenced, and any areas the Commission would like prioritised, so as best to assist the Commission in the circumstances.

Yours faithfully,

  
**Andrew Maher**  
Partner  
Allens

  
**Belinda Thompson**  
Partner  
Allens

**Matthew McCarthy**  
Managing Associate  
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