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Mr Craig Phillips and
 Ms Kate Gill-Herdman
 Corrs Chambers Westgarth
 Solicitors Assisting the Royal Commission

4 June 2021

By Email : **Personal Information**
Personal Information

Dear Mr Phillips and Ms Gill,

**ROYAL COMMISSION INTO THE CASINO OPERATOR AND LICENCE
 (ROYAL COMMISSION) – VICTORIAN COMMISSION FOR GAMBLING AND
 LIQUOR REGULATION (VCGLR) – NOTICE TO PRODUCE NTP-123**

1. We refer to the Notice to Produce dated 28 May 2021 issued to the VCGLR (NTP-123).
2. In accordance with the Royal Commission's document management protocol:
 - a. we **enclose** an itemised electronic index of the documents in Microsoft Excel format. A copy of this index is also contained in the encrypted ZIP file; and
 - b. we will shortly provide you with an encrypted ZIP file containing documents responsive to NTP-123, through your secure file transfer platform
3. In relation to these documents, the VCGLR refers to and maintains the position concerning confidentiality, legal professional privilege and public interest immunity set out in previous correspondence, including your letter dated 22 March 2021.
4. We are instructed that the VCGLR has identified documents that are responsive to category 1(c) of NTP-123, but that were not properly digitised when they were archived. Most of the pages are only partial scans with missing text. The VCGLR has taken steps to retrieve the relevant hardcopy files from its archives and expects to receive the documents by Monday, 7 June 2021. We will produce the responsive material to the Royal Commission as soon as the VCGLR has properly digitised and reviewed the documents. We anticipate that we will be in a position to do this by the end of Monday, 7 June 2021.
5. We are further instructed that, due to the COVID-19 lockdown measures currently in place in Victoria, the VCGLR has been unable to conduct the searches of its hard copy records it would otherwise have undertaken to identify responsive materials. Once these restrictions ease, we will update you on any further responsive material the VCGLR identifies for production.

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6. Finally, we are instructed that NTP-123 calls for production of material which may relate to or be in the possession of the State. We would be grateful if you could please confirm whether the Royal Commission has any objection to the VCGLR disclosing to the State a copy of NTP-123 and some or all of the responsive materials for the purposes of the State considering any Public Interest Immunity or other claims.
7. Please contact me if you wish to discuss.

Yours faithfully

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JOHN FOGARTY
Partner
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Direct **Personal**
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