

From: Sigrid McCawley <[REDACTED]>  
Subject: RE: Letters Rogatory  
Date: 30 November 2018 at 16:12:19 GMT  
To: [REDACTED] <[REDACTED]>  
Cc: "[REDACTED]" <[REDACTED]>, "Paul Cassell ([REDACTED])" <[REDACTED]>, Stan Pottinger <[REDACTED]>

Hi [REDACTED] – I should have been clearer. You can of course speak to your family but I am just cautioning you that you should not discuss the case or things your lawyers are telling you because that will break the privilege and they could be asked about conversations in their depositions. I am just trying to ensure that you protect yourself.

Thanks  
Sigrid

**Sigrid McCawley** Partner

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**From:** [REDACTED] [mailto:[REDACTED]] **Sent:** Friday, November 30, 2018 11:09 AM **To:** Sigrid McCawley **Cc:** [REDACTED]; Paul Cassell ([REDACTED]); Stan Pottinger **Subject:** Re: Letters Rogatory

How can I not contact my entire family and I have been in recent contact with [REDACTED]? I have known him for 10 years....

On 30 Nov 2018, at 17:00, Sigrid McCawley <[REDACTED]> wrote:

Hello [REDACTED] – these are the letters rogatory that Defendants are seeking that we discussed further on the phone. The defendants still have to seek approval from the court and we have already told them that we will be objecting to these depositions going forward but in full disclosure to you – it is highly likely that the Judge will allow anyone who has relevant information from the time period or information generally that could affect your claims to be deposed.

As we discussed, both sides will have their own witnesses to present at trial. Please do not attempt to contact these witnesses (other than of course [REDACTED] who [REDACTED]) because anything you say to them they can be asked about in deposition so you need to be very careful not to e-mail or speak to them in detail about the case or anything your lawyers have told you because that could result in a waiver of your privilege with your lawyers which would hurt your case.

Take care and we will talk tomorrow.  
Sigrid

**Sigrid McCawley** Partner

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<Letter Rogatory – [REDACTED].pdf><Letter Rogatory – [REDACTED] Mother.pdf><Letter Rogatory – [REDACTED].pdf><Letter Rogatory – Leslie Benzies.pdf><Letter Rogatory – [REDACTED].pdf><Letter Rogatory – [REDACTED] and [REDACTED]>