

TABLE OF CONTENTS

<i>Preface to the Second Edition</i>	vii
<i>Preface to the First Edition</i>	ix
<i>Table of Cases</i>	xxv
<i>Table of Legislation</i>	lix
<i>Table of Practice Directions</i>	lxiii

CHAPTER 1 THE HONG KONG REGIME

CHAPTER 2 PRE-ACTION DISCOVERY

1. The Power to Order Pre-Action Discovery	2-001
2. The Nature of the Test	2-010
(a) <i>Zhang Shouen v Standard Chartered Bank (Hong Kong) Ltd</i>	2-010
(b) Class of documents.....	2-012
(c) Differences from specific discovery: Relevance test.....	2-013
(d) Differences from specific discovery: Reversing the burden.....	2-019
(e) Relevance of English authority.....	2-021
(f) Arguability.....	2-025
(g) “Likely”	2-031
(h) Fishing	2-033
(i) Fraud.....	2-035
(j) Quantum documents	2-036
(k) After proceedings have started	2-037
(l) Service out of the jurisdiction.....	2-038
3. Pre-Action Disclosure: Cost Implications	2-039
4. Pre-Action Discovery: Discussion	2-043

CHAPTER 3 EARLY DISCLOSURE IN THE PROCEEDINGS FROM THE OPPOSING PARTY

1. Early Disclosure in the Proceedings.....	3-001
2. Documents Referred to in Pleadings and Evidence	3-007
(a) “Referred to”	3-008
(b) Discretion.....	3-011
(c) Exhibits.....	3-014

TABLE OF CONTENTS

(d) Documents outside the party's possession custody or power.....	3-019
(e) Implied undertaking.....	3-023
3. Disclosure under <i>Anton Piller</i> Orders	3-024
(a) <i>Anton Piller</i> orders.....	3-024
(b) The application and the order	3-031
4. Disclosure under <i>Mareva</i> Orders.....	3-044
(a) Freezing orders	3-044
(b) Third parties.....	3-053
(c) Disclosure in aid of asset freezing injunctions	3-055
(d) Section 21B of the High Court Ordinance.....	3-059
(e) Implied undertaking.....	3-061
(f) In aid of foreign proceedings	3-062
(g) Individuals and businesses.....	3-066
5. Nominees: The <i>Chabra</i> Jurisdiction.....	3-067
6. Disclosure in Tracing Claims	3-071
(a) Living and legal expenses.....	3-072
(b) Disclosure in proprietary claims.....	3-074

CHAPTER 4 DISCOVERY AGAINST NON-PARTIES

1. Subpoenas and Non-Party Discovery.....	4-005
(a) Relationship with subpoenas	4-005
(b) Individual documents separately described	4-010
2. The Requirements.....	4-016
3. No Exercise of Judgment by the Non-Party	4-024
4. Confidentiality Objections.....	4-027
5. Interests of the Third Party	4-030
6. Who May Object?.....	4-034
(a) Agent and principal.....	4-034
(b) Who can apply to set aside and on what grounds?	4-035
7. Documents Outside the Jurisdiction.....	4-036

CHAPTER 5 DISCLOSURE FROM FACILITATORS: *NORWICH PHARMACAL*

1. The <i>Norwich Pharmacal</i> Order.....	5-001
(a) Nature of the jurisdiction	5-001
(b) The jurisdiction in Hong Kong	5-007
(c) Facilitators	5-009
(d) Must a wrong be shown against the ultimate tortfeasor?	5-014
(e) "Full information"	5-016
(f) Must the information be required for proceedings intended to be commenced?	5-018

TABLE OF CONTENTS

(g) Order in aid of proceedings abroad	5-019
(h) Factors to take into account in determining whether to make an order.....	5-027
(i) Is a <i>Norwich Pharmacal</i> order an exceptional remedy?.....	5-030
(j) Some discarded tests.....	5-032
(k) Jurisdictional issues	5-033
(l) The collateral undertaking	5-036
(m) Applications against journalists.....	5-037
2. <i>Bankers Trust</i> Orders.....	5-042
(a) <i>Bankers Trust Co v Shapira</i>	5-042
(b) Orders in aid of equitable rights	5-044
3. Bankers' Records.....	5-045

CHAPTER 6 OTHER RIGHTS OF ACCESS TO DOCUMENTS

1. Companies.....	6-003
(a) Shareholder access.....	6-003
(b) Shareholders: privilege	6-004
(c) Directors	6-016
(d) Jurisdiction of the court to give access to company documents.....	6-021
(e) Receivers.....	6-023
2. Partnerships	6-024
3. Trust Documents.....	6-025
(a) Access for beneficiaries	6-026
(b) Privilege	6-030
4. Agents.....	6-033
(a) The principles	6-033
(b) Solicitors	6-038
(c) Rights of access against the agent	6-041
5. Rights to Inspect or Preserve Documents as Property	6-044
6. Rights of Lien in Documents.....	6-047

CHAPTER 7 DISCOVERY

1. <i>Peruvian Guano</i> Remains	7-001
(a) No change under CJR	7-001
(b) Procedures for discovery	7-004
2. Who Must Give Disclosure?	7-007
(a) The Government	7-008
(b) Companies	7-009
(c) Receivers and administrators	7-010
(d) Underwriters	7-011
(e) Representative proceedings	7-012

TABLE OF CONTENTS

(f) Nominees.....	7-013
(g) Assignors and assignees	7-014
(h) Agent and principal.....	7-015
(i) Trustees.....	7-016
3. Discovery.....	7-017
(a) The test for discovery	7-017
(b) Multiple parties	7-021
(c) Facets of standard disclosure	7-026
4. Control.....	7-038
(a) The <i>Lonrho</i> test	7-038
(b) One-man companies	7-042
(c) Possession	7-045
(d) Power a question of fact	7-049
(e) Where the affiliate is accustomed to give access.....	7-050
(f) Documents no longer in the power of a party.....	7-052
(g) Avoiding possession	7-055

CHAPTER 8 PRACTICALITIES OF DISCOVERY

1. The Lawyer's Duty	8-001
2. Late Discovery	8-009
3. The Application for Specific Disclosure	8-015
(a) Further and better list of documents	8-016
(b) Verification by affidavit	8-017
(c) The application for specific discovery	8-018
(d) Disputed claims of relevance	8-027
(e) Form of order	8-030
(f) Discovery applications: strategies for litigation	8-031
4. Problem Areas	8-033
(a) Fishing	8-033
(b) Credit	8-034
(c) Documents from previous proceedings	8-035
(d) Judicial review	8-036
(e) Disclosure of funding	8-037
(f) Disclosure under supervision of opponents or experts	8-038
5. Inspection	8-044
(a) Inspection of the other side's discovery	8-044
(b) Inspection by the court	8-047

CHAPTER 9 ELECTRONIC DISCOVERY

1. Electronic Discovery in Hong Kong	9-001
2. Case Law	9-008
3. Proportionate Electronic Searches	9-010

TABLE OF CONTENTS

4. E-Disclosure: Practical Issues	9-012
(a) Sources of electronic disclosure	9-013
(b) Deletions	9-014
(c) Smoking guns	9-015
(d) Drafts	9-016
(e) Work and home computers	9-017
(f) Local area networks	9-018
(g) Metadata	9-019
(h) Access cards	9-020
(i) New types of media	9-021
(j) Social networks	9-022
(k) Inadvertent disclosure of privileged electronic documents	9-023
(l) Predictive coding	9-024

CHAPTER 10 OBJECTIONS TO DISCOVERY: CONFIDENTIALITY AND REDACTION

1. Confidentiality and Ways of Dealing with Confidentiality	10-003
(a) Confidentiality as a ground for objection	10-003
(b) Confidentiality: The three-party position	10-004
(c) Naming third parties	10-008
(d) Protecting those who have given evidence to the police	10-011
(e) Confidentiality and arbitrations	10-013
(f) Limiting who may inspect: Confidentiality clubs	10-015
2. Blanking Out	10-020
(a) The principle of redaction	10-020
(b) Privilege redactions	10-022
(c) Irrelevance redactions	10-024
(d) The procedure for the court to follow	10-032

CHAPTER 11 FAILURE AND ABUSE OF DISCLOSURE OBLIGATIONS

1. Failure to Comply	11-001
(a) Unless orders	11-002
(b) Relief from sanctions	11-005
2. Destruction and Forgery of Documents	11-007
(a) Spoliation and destruction of documents	11-007
(b) Litigation not in reasonable contemplation	11-010
(c) Litigation in reasonable contemplation	11-011
(d) Once proceedings have commenced	11-015
(e) After the obligation to disclose has arisen	11-016
3. Document Destruction and Disclosure Failure-Available Remedies	11-017
(a) Strike out	11-018
(b) An application to strike out at trial	11-024

TABLE OF CONTENTS

(c) Where the failure to comply is in dispute	11-026
(d) Perverting the course of justice.....	11-032
(e) Adverse inferences.....	11-033
(f) Absence of contemporaneous evidence relevant to credibility of witnesses.....	11-046
(g) Contempt.....	11-048

CHAPTER 12 PRIVILEGE: A FUNDAMENTAL RIGHT

1. The Modern View of Privilege	12-001
(a) Introduction to legal professional privilege.....	12-001
(b) The right to claim privilege	12-005
(c) Privilege and the Basic Law	12-011
(d) <i>Solicitor v Law Society of Hong Kong</i> : Discussion	12-018
(e) Other Basic Law and Hong Kong Bill of Rights issues	12-022
2. <i>Derby Magistrates</i>	12-024
(a) <i>R v Derby Magistrates Court, ex p B</i> : The right to claim privilege.....	12-024
(b) Can a lawyer ever disclose privileged information?.....	12-033
3. Abrogation of Privilege	12-035

CHAPTER 13 PRIVILEGE: GENERAL PRINCIPLES

1. What Privilege Involves.....	13-001
(a) The requirement of confidentiality.....	13-001
(b) Two categories of privilege	13-002
(c) Legal professional privilege distinguished from other objections to disclosure	13-004
(d) Privilege belongs to the client.....	13-006
(e) Duration of privilege.....	13-007
(f) Adverse inferences and the claim for privilege	13-010
(g) Dissemination of privileged material.....	13-011
2. Foreign Law and Privilege	13-012
3. Which Persons May Claim Privilege?.....	13-023
(a) Litigants in person	13-023
(b) Witnesses	13-024
(c) Principal and agent	13-026
(d) The police and government	13-028
4. In-House Lawyers	13-029
(a) Privilege applies to in-house lawyers	13-029
5. Communications with Lawyers and Non-Lawyers	13-032
(a) Communications with lawyers alone protected	13-032
(b) Communications with non-lawyers: <i>Prudential v Pandolfo</i>	13-036
6. Communications with Lawyers and Non-Lawyers: Problem Areas	13-040
(a) What sort of lawyer	13-040
(b) Lawyers working with non-lawyers	13-045
(c) Statutory entitlement to claim privilege	13-046

TABLE OF CONTENTS

CHAPTER 14 CLAIMING PRIVILEGE

1. Manner of Claim for Privilege	14-001
(a) Listing of privileged documents compendiously.....	14-001
(b) To what extent is the claim for privilege conclusive?	14-007
2. The Duty of the Lawyer in Claiming Privilege	14-012
3. Parts of Documents, Selections and Copies	14-015
(a) Privilege in part of a document.....	14-015
(b) Mere reference to legal advice in an otherwise unprivileged document	14-016
(c) Audit letters	14-019
(d) Copies	14-020
(e) The <i>Lyell v Kennedy</i> exception	14-024
(f) Giving a clue to the legal advice.....	14-030
4. Communications Between the Parties	14-033
5. Problem Areas	14-036
(a) Lawyers' feenotes	14-036
(b) Client care and retainer letter.....	14-038
(c) After the event insurance	14-039
(d) Videos	14-040
(e) Translations	14-041
(f) Documents intended to be put before lawyers	14-042
(g) Lawyers' working papers	14-043
(h) Documents seen by a lawyer	14-044

CHAPTER 15 LEGAL ADVICE PRIVILEGE

1. Legal Advice Privilege	15-001
(a) The development of the distinction between legal advice and litigation privilege	15-002
(b) When may legal advice privilege be claimed?	15-004
(c) The "client"	15-008
(d) <i>Citic Pacific Ltd v Secretary for Justice</i>	15-010
2. The Breadth of Legal Advice Privilege	15-015
(a) The <i>Balabel</i> test after <i>Three Rivers</i>	15-015
3. The Boundaries of Legal Advice Privilege	15-023
(a) Knowledge derived from the retainer	15-024
(b) Extraneous matters learnt during the lawyer/client relationship	15-027
(c) Client's name, address and details	15-030
(d) Details of witnesses interviewed	15-033

CHAPTER 16 LITIGATION PRIVILEGE

1. Litigation in Reasonable Prospect	16-001
(a) The rationale for litigation privilege	16-001
(b) What communications are covered?	16-003
(c) Conducting litigation	16-005

TABLE OF CONTENTS

(d) The dominant purpose test in litigation privilege.....	16-007
(e) Whose purpose?.....	16-009
(f) "Single wider purpose".....	16-012
(g) Dual purpose cases.....	16-015
(h) Litigation in reasonable prospect.....	16-016
2. Adversarial Proceedings.....	16-021
3. Litigation Privilege and Investigations: <i>Director of the Serious Fraud Office v ENRC</i>	16-028
4. Litigation Privilege: Other Problem Areas.....	16-037
(a) Statutory reports.....	16-037
(b) Insolvency proceedings.....	16-038
(c) Documents obtained for the purpose of litigation.....	16-040
(d) Litigants in person	16-041

CHAPTER 17 PRIVILEGE DERIVING FROM JOINT AND COMMON INTERESTS

1. Joint Privilege and Joint Interest	17-001
(a) No privilege between joint clients	17-001
(b) No privilege between persons with a joint interest.....	17-002
(c) Joint privilege for executives or directors and for the company	17-004
(d) Successors-in-title.....	17-006
2. Common Interest Privilege: The Shield	17-009
(a) The shield and the sword	17-009
(b) Common interest privilege as a shield: The principle	17-011
(c) What sort of common interest will suffice?.....	17-013
(d) To what sort of relationships does this form of common interest privilege apply?....	17-015
(e) When must the common interest arise?.....	17-017
(f) Waiver in common interest privilege cases	17-020
(g) Has limited waiver made this principle redundant?	17-021
3. Access to Privileged Documents of Another Party	17-023
(a) Obtaining access to privileged documents	17-023
(b) The cases rationalised	17-028

CHAPTER 18 "WITHOUT PREJUDICE" PRIVILEGE

1. The "Without Prejudice" Rule.....	18-001
(a) Formulation of the principle.....	18-001
(b) "Without prejudice" privilege in Hong Kong.....	18-003
(c) "Without prejudice" as a form of privilege	18-005
(d) Existence of a <i>bona fide</i> dispute	18-007
(e) Whose purpose?.....	18-010
(f) Variety of uses of the words "without prejudice".....	18-011
(g) Opening shots	18-012

TABLE OF CONTENTS

(h) Importance of the use of the words "without prejudice"	18-014
(i) Going beyond the "without prejudice" meeting	18-017
(j) Where there is no bona fide dispute.....	18-018
(k) Proper law issues	18-022
2. Exceptions to the "Without Prejudice" Principle	18-024
3. Statements of Fact and Acknowledgements	18-028
(a) <i>Re Daintrey</i>	18-028
(b) Acknowledgements.....	18-029
4. The Two-Party and the Three-Party Situation	18-032
(a) The two-party situation.....	18-032
(b) The three-party situation.....	18-033
(c) <i>Muller v Linsley & Mortimer</i>	18-035
(d) Limited to the same or related proceedings?	18-038
(e) "Without prejudice" material in the hands of a third party.....	18-041
5. Problem Areas	18-043
(a) Admissibility of without prejudice negotiations in interlocutory applications	18-043
(b) Admissibility of without prejudice correspondence on issues of costs	18-047
(c) Waiver of "without prejudice" privilege.....	18-048
6. Unambiguous Impropriety	18-051
(a) The principle	18-051
(b) Perjury.....	18-054
(c) Blackmail.....	18-058
(d) Other cases	18-061
(e) Unambiguous impropriety: discussion	18-064
7. Mediation Privilege	18-066
(a) The Mediation Ordinance	18-067
(b) Mediation as assisted without prejudice negotiation	18-071

CHAPTER 19 PRIVILEGE AGAINST SELF-INCRIMINATION

1. Self-Incrimination: The Principle.....	19-001
(a) No obligation to incriminate oneself	19-001
(b) Effect of the privilege	19-005
(c) How great must the risk be?	19-008
(d) Companies and individuals.....	19-010
(e) Manner and form of claiming the privilege	19-014
(f) Pre-existing materials	19-016
(g) Statements made in the course of committing the offence	19-018
2. Facets of the Privilege	19-019
(a) Search orders and pornographic material	19-019
(b) Inferences drawn from taking the privilege.....	19-021

TABLE OF CONTENTS

(c) Procedural effect: stays and judgments	19-024
(d) Orders made without notice	19-026
(e) Loss of the right to claim the privilege	19-027
3. Statutory Abrogation	19-028
(a) Does the statute take away the privilege?	19-029
(b) Where the privilege is abrogated	19-034
(c) Basic Law issues	19-038

CHAPTER 20 PUBLIC INTEREST IMMUNITY

1. Development of Public Interest Immunity	20-001
(a) Hong Kong authority	20-001
(b) From Crown privilege to public interest immunity today	20-004
(c) The distinction between privilege and public interest immunity	20-011
(d) Criminal and civil cases	20-012
(e) The modern approach of government	20-013
(f) Is anything left of the old class claim?	20-015
2. Public Interest Immunity in Practice: Civil Cases	20-016
(a) Making a claim	20-016
(b) Public interest immunity in civil cases today	20-019
(c) Waiver of public interest immunity	20-021
(d) Inadvertent disclosure in public interest immunity cases	20-022
3. Categories of Documents Which May Be Subject to Immunity	20-023
(a) National security	20-024
(b) Diplomatic relations and international comity	20-025
(c) Workings of central government	20-026
(d) Proper functioning of the public service	20-027
(e) The police	20-028
(f) Confidentiality and confidential relationship	20-029
(g) Protection of sources and informants	20-030
(h) Information leading to the detection of crime	20-032
(i) Journalists' sources	20-033
(j) Records relating to children	20-034

CHAPTER 21 WAIVER OF PRIVILEGE

1. Loss of Confidentiality	21-001
(a) Reasonable expectation of privacy	21-003
(b) Loss of confidentiality distinguished from waiver of privilege	21-006
(c) Confusion between waiver of privilege and loss of confidentiality	21-008
(d) Putting summary of advice in public domain	21-009
2. Waiver of Privilege: The Principles	21-011
(a) Not a single principle	21-011
(b) Cherry-picking	21-012
(c) Waiver as an objective doctrine	21-017

TABLE OF CONTENTS

(d) The test for waiver of privilege	21-018
(e) What sort of reference constitutes a waiver?	21-021
(f) The right to waive privilege belongs to the client	21-025
3. Collateral Waiver	21-028
(a) The importance of collateral waiver	21-028
(b) "Deploying in court"	21-029
(c) Deployment in interlocutory proceedings and at trial	21-034
(d) "The issue in question"	21-037
(e) Waiver in the course of evidence	21-041
(f) Wasted costs proceedings	21-045
4. Waiver of Privilege: Particular Cases	21-047
(a) Pleadings	21-047
(b) Affidavits	21-048
(c) Witness statements	21-049
(d) Documents referred to in pleadings	21-051
(e) Documents referred to in affidavits	21-053
(f) Documents referred to in witness statements	21-054
(g) Hearsay notices	21-055
(h) Expert reports	21-056
(i) Documents referred to in expert reports and instructions to the expert	21-057
(j) Inclusion in the wrong part of the list of documents	21-059
(k) Waiver in lawyers' correspondence	21-060

CHAPTER 22 LIMITED, SELECTIVE AND IMPLIED WAIVER

1. Limited Waiver: Disclosure to Third Parties	22-001
2. Limited Waiver: Disclosure to the Opposing Party	22-008
3. Limited Waiver: Outside Court Proceedings	22-013
(a) Limited waiver outside proceedings	22-014
(b) <i>Citic Pacific Ltd v Secretary for Justice</i> : Limited waiver and regulators	22-017
(c) Employees and agents seeing privileged material	22-019
(d) Limited waiver: Discussion	22-021
4. Implied Waiver of Privilege	22-026
(a) The implied waiver principle	22-026
(b) Implied waiver and material facts	22-032

CHAPTER 23 LOSS OF PRIVILEGE THROUGH INADVERTENCE AND FRAUD

1. Documents Improperly Obtained or Disclosed	23-001
(a) The principle	23-001
(b) Inadvertent disclosure in the course of proceedings	23-005
(c) Granting relief	23-012

TABLE OF CONTENTS

(d) Injunctions for misuse.....	23-015
(e) Mixed material.....	23-018
(f) The litigant in person	23-020
(g) The position of the Hong Kong lawyer	23-021
(h) The inadvertent disclosure rules—are they fit for purpose?.....	23-024
2. Loss of Privilege Through Fraud.....	23-029
(a) No privilege in iniquity.....	23-029
(b) To what sort of fraud does the rule apply?	23-031
(c) Abuse of the professional relationship	23-034
(d) Whose fraud?.....	23-038
(e) Strength of case and timing	23-043
(f) Private investigators.....	23-044
3. Fraud and Inadvertent Disclosure: Procedural Issues	23-045
4. Exclusion of Documentary Evidence	23-050
(a) No general power to exclude	23-050
(b) Video films.....	23-052

CHAPTER 24 THE IMPLIED UNDERTAKING

1. Development of the Undertaking	24-001
(a) History of the undertaking.....	24-001
(b) The compulsion principle	24-004
(c) Particular cases	24-012
(d) Order for express undertaking	24-013
(e) Sanctions for breach	24-014
(f) Arbitrations	24-016
(g) Material obtained under statutory powers	24-018
2. Obtaining Permission to Use the Documents	24-019
3. Termination of the Undertaking	24-025
(a) Documents read in court.....	24-025
(b) Orders restraining use of documents after the undertaking comes to an end	24-027
(c) The position as regards third parties.....	24-030
(d) Release of collateral undertaking given by contract.....	24-031

CHAPTER 25 THE INTERNATIONAL ELEMENT

1. Witnesses Out of the Jurisdiction	25-001
2. Evidence in the Jurisdiction for Foreign Proceedings.....	25-005
(a) Powers of Hong Kong court: Civil proceedings.....	25-006
(b) No general disclosure of documents.....	25-008
(c) Principles applied by the Hong Kong court on application.....	25-014
(d) Applying for an order	25-026
(e) Conduct of the examination.....	25-027

TABLE OF CONTENTS

3. Commencing Proceedings Abroad for Discovery	25-028
4. Documentary Orders Against Foreign Entities in Hong Kong Proceedings	25-031

CHAPTER 26 WITNESS STATEMENTS AND OTHER WRITTEN EVIDENCE

1. Taking Witness Statements	26-001
(a) Witnesses of fact: The first contact.....	26-001
(b) Taking an early proof	26-002
(c) No property in a witness	26-004
(d) Paying the witness	26-006
(e) Persuading the witness	26-007
(f) Win bonuses	26-009
(g) Coaching the witness	26-012
(h) Witness coaching and training: Discussion	26-023
2. Exchange of Witness Statements	26-030
(a) The statement	26-030
(b) Late service	26-035
3. Witness Statements at Trial	26-036
(a) Evidence-in-chief.....	26-036
(b) The status of witness statements at trial and thereafter	26-038
(c) Attacking your own witness	26-040
(d) Giving evidence by video link	26-042
4. Hearsay Evidence	26-047
(a) Part IV of the Evidence Ordinance	26-047
(b) Admissibility: Section 47 of the Evidence Ordinance	26-051
(c) Safeguards	26-057
(d) Weight	26-060
(e) Other sections of the Evidence Ordinance	26-064
(f) Hearsay evidence: The approach of the court	26-065

CHAPTER 27 EXPERT REPORTS

1. Expert Evidence: Admissibility and Proof	27-001
(a) When is expert evidence admissible?	27-001
(b) Foreign law	27-003
(c) Competence and compellability	27-005
(d) Can the expert prove the facts?	27-008
(e) Admissibility issues	27-010
2. Expert Evidence: The Role of the Court	27-012
3. Expert Impartiality	27-018
(a) Overriding duty to the court	27-018
(b) Expert impartiality: the practice	27-020
(c) Experts connected with a party	27-021

TABLE OF CONTENTS

4. Joint Experts	27-024
(a) Single Joint Expert Orders.....	27-024
(b) Bias and joint experts.....	27-029
(c) Application for judgment based on joint expert's report.....	27-031
5. Expert Reports and Meetings	27-032
(a) Meetings and joint statements	27-032
(b) Exchange or sequential reports.....	27-035
6. Changing Experts	27-036
(a) Disclosure of unused reports	27-036
(b) Changing expert.....	27-042
(c) Changing expert: Discussion	27-047
(d) Guidance on instructing experts	27-049
<i>Index.....</i>	453