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Notice of Decision and Reasons for Decision

Applicant: 'AO7'

Agency: State Revenue Office

Decision date: 3 October 2019

Exemptions considered: Sections 32(1), 33(1) and 34(1)(b)

Citation: 'AO7' and State Revenue Office (Freedom of Information) [2019]

VICmr 133 (3 October 2019)

FREEDOM OF INFORMATION – legal professional privilege – invoices – commercial in confidence – expose a business undertaking unreasonably to disadvantage – personal affairs information

All references to legislation in this document are to the *Freedom of Information Act 1982* (Vic) (**FOI Act**) unless otherwise stated.

Notice of Decision

I have conducted a review under section 49F of the Agency's decision to refuse access to documents requested by the Applicant under the FOI Act.

My decision on the Applicant's request differs from the Agency's decision in that I have decided to release additional information in the documents.

The Schedule of Documents in **Annexure 1** sets out my decision in relation to each document.

My reasons for decision follow.

Joanne Kummrow

Public Access Deputy Commissioner

3 October 2019

Reasons for Decision

Background to review

- 1. The Applicant made a request to the Department of Treasury and Finance (**DTF**) for access to the following documents:
 - [invoices relating to litigation between the Applicant and the Agency including relating to transcripts of court hearings and filing fees].
- Section 18(2)(b)(i) permits an agency to which a request is made, to transfer the request, if the
 document is not in the possession of that agency but is in the possession of another agency.
 Accordingly, on 9 April 2019, the Applicant's request was transferred from DTF to the State Revenue
 Office (the Agency) in accordance with the provision set out in section 18(2)(b)(i).
- 3. In its decision, the Agency identified 54 documents relevant to the terms of the Applicant's request. It decided to release one document in full and refuse access to 53 documents in full.
- 4. Further, the Agency advised that no record of expenses relating to transcript costs were located in its search for documents.

Review

- 5. The Applicant sought review by the Information Commissioner under section 49A(1) of the Agency's decision to refuse access.
- 6. I have examined copies of the documents subject to review.
- 7. The Applicant and the Agency were invited to make a written submission under section 49H(2) in relation to the review.
- 8. I have considered all communications and submissions received from the parties, including:
 - (a) the Agency's decision on the FOI request;
 - (b) information provided with the Applicant's review application;
 - (c) the Agency's submission dated 17 June 2019; and
 - (d) all communications between this office, the Applicant and the Agency.
- 9. In undertaking my review, I have had regard to the object of the FOI Act, which is to create a general right of access to information in the possession of the Government or other public bodies, limited only by exceptions and exemptions necessary to protect essential public interests, privacy and business affairs.

Review of exemptions

10. The Agency relied on the exemptions in sections 32(1), 33(1) and 34(1)(b) to refuse access to the documents. The Agency's decision letter sets out the reasons for its decision.

Submissions

11. The Applicant did not make a submission in relation to the review. However, from the information provided in the review application, I note the Applicant's personal interest in accessing information that concerns them as a party to legal proceedings. I also note the Applicant's comments relating to a broader public interest in accountability of the public sector when it concerns the spending of public funds.

- 12. The Agency provided a submission in confidence. However, as outlined in the decision letter, the Agency submits:
 - (a) In relation to section 32(1), the communications in the exempt documents relate to work undertaken by legal practitioners for the provision of legal services to the Agency.
 - (b) In relation to the application of section 34(1)(b), disclosure of the invoices would reveal the hourly rate and billing practices of external legal advisers. The revelation of this information could place the commercial undertakings at a competitive disadvantage and cause harm to the competitive position of each undertaking who operate within a highly competitive market.
 - Further, there is a strong public interest in maintaining confidentiality with respect to the details of professional services when such services are still being provided. Otherwise, disclosure could inhibit the conduct of litigation.
 - (c) In relation to the application of section 33(1), the invoices were provided to the Agency in confidence. It would be an unreasonable intrusion into the personal affairs of individuals employed or engaged by the Agency's external legal advisors or the Agency on the basis that, release under FOI is unconditional and the information provided in connection with work undertaken on matters that are litigious in nature is sensitive.

Section 32(1)

- 13. A document will be exempt under section 32(1) where it contains a confidential communication:
 - (a) between the client (or the client's agent) and the client's professional legal advisers, that was made for the dominant purpose of obtaining or providing legal advice or is referrable to pending or contemplated litigation; or
 - (b) between the client's professional legal advisers and third parties, that was made for the dominant purpose of pending or contemplated litigation; or
 - (c) between the client (or the client's agent) and third parties that was made for the purpose of obtaining information to be submitted to the client's professional legal advisers for the dominant purpose of obtaining advice on pending or contemplated litigation.
- 14. The rationale behind legal professional privilege as an immunity is based in promoting the public interest. As the High Court of Australia observed:

The rationale of this head of privilege, according to traditional doctrine, is that it promotes the public interest because it assists and enhances the administration of justice by facilitating the representation of clients by legal advisers, the law being a complex and complicated discipline. This it does by keeping secret their communications, thereby inducing the client to retain the solicitor and seek his advice, and encouraging the client to make a full and frank disclosure of the relevant circumstances to the solicitor.¹

- 15. In this matter, the Agency applied the exemption in section 32(1) to all documents on the basis that they disclose summaries of confidential communications that were made for the dominant purpose of obtaining or providing legal advice.
- 16. The Agency's decision letter cited the matter of *Coulson v Department of Premier and Cabinet*² (**Coulson decision**) noting in that matter, the Victorian Civil and Administrative Tribunal (**VCAT**) confirmed detailed information contained in a memorandum of costs (such as an invoice) and referring to work undertaken by an external legal adviser could reveal the nature of instructions given.

¹ Grant v Downs (1976) 135 CLR 674 at [19].

² [2018] VCAT 229.

- 17. Unlike in the Coulson decision, the Agency claimed privilege over the whole of the invoices. Whether the whole invoice could be considered privileged and exempt under section 32(1) would depend on the nature and content of the document and the circumstances in which it was created.³
- 18. In the matter of *Hodgson v Amcor; Amcor Ltd v Barnes Anor (No. 2)*⁴ (**Amcor decision**), the Supreme Court of Victoria summarised the position with respect to legal professional privilege claimed over memoranda of fees or solicitor fee/time ledgers:⁵

It is accepted that legal professional privilege attaches to a communication undertaken, or to a document brought into existence, for the dominant purpose of giving or obtaining legal advice. At first glance, a memorandum of professional costs or a time ledger prepared by a solicitor does not have this dominant purpose. It is prepared for the purpose of accounting to the client for work done, and rendering a bill of costs in respect of it.

However, and subject to meeting the dominant purpose test, legal professional privilege also protects the disclosure of documents that record legal work carried out by the lawyer for the benefit of the client. In these cases, the protection extends to notes, memoranda or other documents made by a lawyer that relate to information sought by the client to enable him or her to advise.

...

In the usual case, a memorandum of fees is brought into existence, not for the dominant purpose of obtaining legal advice or for use in legal proceedings but principally for the purpose of recording and raising charges in respect of work which had been already completed. In such a case, where, for example the memorandum of fees merely set out the dates and refers to the action taken in respect of which a charge is made, no privilege will attach. This was the case in *Lake Cumbeline*. ⁶

...

However, cases where memoranda or bills of costs rendered by a solicitor are in detailed form and disclose, either directly or indirectly, communications concerning matters that are protected by the privilege, including instructions given by a client to his solicitors, the advice given, approaches to potential witnesses and other such things, stand in an altogether different class. Such memoranda and bills of costs are likewise privileged.

Were the position to be otherwise, it would work to undermine the privilege and the public policy it seeks to advance. It would have the consequence that a party, while initially at least being able to seek legal advice and initiate the creation of documents for use in legal proceedings fully protected by legal professional privilege, would risk losing the benefits of the privilege when it comes time to pay for the legal services provided. If this was to occur, in my opinion the outcome would "substantially impede freedom of communication between client and legal advisers, which is at the very heart of the privilege, by discouraging free and uninhibited discussion of the issues and questions in the fear that these communications could later be disclosed to the severe disadvantage of the client".⁷

- 19. Therefore, the question to be determined is whether the invoices as a whole disclose, directly or indirectly, communications subject to legal professional privilege.
- 20. I have inspected the documents subject to review. Each contains a cover page containing a brief description of services provided and total invoiced amount, a 'time summary schedule' outlining the hourly rate for each external lawyer who undertook work on the matter and a 'schedule of professional fees' that provides a narration, set out in dot points, of discrete tasks performed. The degree of detail differs from invoice to invoice.
- 21. Having carefully examined each document, I have determined parts of the documents set out in detail tasks performed and narrations that disclose, either directly or indirectly, communications concerning matters protected by legal professional privilege between the Agency and its legal

³ Bank Mansion Pty Ltd (in liq) v Franklin [2018] VSC 52 at [34].

⁴ [2011] VSC 204.

⁵ Ibid at [56-63].

⁶ Lake Cumbeline Pty Ltd & Ors v Effem Foods Pty Ltd (1994) 126 ALR 58 at [68].

⁷ Citing Tamberlin J in *Lake Cumbeline* (1994) 126 ALR 58 at [62].

advisers. I am satisfied release would disclose information provided for the dominant purpose of providing legal advice and this information is therefore exempt under section 32(1). It is not appropriate for me to set out in any greater detail the reasons for coming to this conclusion, as to do so may reveal the very information the exemption is intended to protect.

- 22. However, where the documents simply disclose financial information, dates and information of an administrative nature, such as case references, in these instances I am not satisfied release would disclose, either directly or indirectly, instructions or other communications concerning matters that are subject to legal professional privilege.
- 23. Therefore, I am not satisfied the entire content of each invoice contains information that discloses, whether directly or indirectly, legally privileged communications. Accordingly, I am not satisfied each of the invoices as a whole are exempt under section 32(1).
- 24. My decision on the application of section 32(1) in relation to each document is set out in the Schedule of Documents at **Annexure 1**.

Section 34(1)(b)

- 25. A document will be an exempt document under section 34(1)(b), if the document contains information:
 - (a) acquired from a business undertaking;
 - (b) that relates to matters of a business, commercial or financial nature;
 - (c) the disclosure of which, having regard to the matters listed in section 34(2), would be likely to expose the undertaking unreasonably to disadvantage.
- 26. The Agency submitted section 34(1)(b) applies to the documents on the basis each invoice reveals the particular rates and fees incurred for those services. Disclosure of the commercial information would be likely to expose the relevant legal firms and barristers unreasonably to disadvantage as the revelation would impact their competitive position in the market. The Agency further stated that, as the business information relates to current legal proceedings, this increases the sensitivity of the information.
- 27. For the purpose of this review, I accept the information was acquired from the relevant business undertakings by the Agency. I also accept the information relates to matters of a business, commercial or financial nature. Therefore, I must decide whether disclosure would be likely to expose the relevant business undertakings unreasonably to disadvantage.
- 28. In accordance with section 34(3), the Agency advised it consulted with third party undertakings whose business information appears in the documents. I have viewed their responses, noting some third party undertakings objected to the release of their business, commercial and financial information and some third party undertakings consented to the release of their business information.
- 29. In deciding whether disclosure of information would expose an undertaking unreasonably to disadvantage, an agency or Minister may take account of any of the following considerations:
 - (a) whether the information is generally available to competitors of the undertaking;
 - (b) whether the information would be exempt matter if it were generated by an agency or a Minister;
 - (c) whether the information could be disclosed without causing substantial harm to the competitive position of the undertaking; and
 - (d) whether there are any considerations in the public interest in favour of disclosure which outweigh considerations of competitive disadvantage to the undertaking, for instance, the public

interest in evaluating aspects of government regulation of corporate practices or environmental $\operatorname{controls}$ —

and of any other consideration or considerations which in the opinion of the agency or Minister is or are relevant.

- 30. I have considered VCAT's reasoning in the Coulson decision⁸ in which it determined that itemised lists of professional services in relation to legal fees were exempt under section 34(1)(b). This was on the basis that charge-out rates identified in the documents could, if released, expose legal consultants to disadvantage in the open market.
- 31. Having considered the information before me, and noting the timing of the application as it relates to the financial arrangements of legal proceedings currently on foot, I am satisfied similar information contained in the documents in this matter is also exempt under section 34(1)(b).
- 32. Although I consider section 34(1)(b) applies to the documents, I am not satisfied it applies to exempt the documents in full. Where the documents do not detail the individual officers' charge-out rates (for example, invoice dates, administrative expenses, filing fees and total amounts charged) in such instances, I do not consider the information is commercially sensitive information such that its disclosure would expose the legal service provider unreasonably to disadvantage. Therefore, the dates and total costs information set out in the documents is not exempt under section 34(1)(b).
- 33. Further, in the case where a third party undertaking provides consent to the disclosure of its business, commercial and financial information, it would be difficult for an agency to maintain that disclosure of this information would expose the third party undertaking unreasonably to disadvantage.
- 34. For the reasons outlined above, I am not satisfied section 34(1)(b) applies to exempt information in each instance where the Agency has applied this exemption.
- 35. My decision on the application of section 34(1)(b) in relation to each document is set out in the Schedule of Documents at **Annexure 1**.

Section 33(1)

- 36. A document is exempt under section 33(1) if two conditions are satisfied:
 - (a) disclosure of the document under the FOI Act would 'involve' the disclosure of information relating to the 'personal affairs' of a person other than the Applicant; and
 - (b) such disclosure would be 'unreasonable'.
- 37. The concept of 'unreasonable disclosure' involves balancing the public interest in the disclosure of official information with the personal interest in privacy in the particular circumstances of a matter.
- 38. By email dated 12 September 2019, the Applicant advised they do not press access to the names and contact details of third parties, but for individuals already known to them. A list of names was submitted by the Applicant, which included all Agency staff. Therefore, my review will only consider whether it is unreasonable to release the personal affairs information of these particular individuals.
- 39. Where the documents identify a third party not named by the Applicant, this information should remain deleted as irrelevant under section 25.

⁹ Sections 33(1) and 33(2).

^{8 [2018]} VCAT 229.

- 40. Having considered the documents and the circumstances of this matter, I do not consider it would be unreasonable to release the personal affairs information of Agency officers who were directly involved in legal action against the Applicant. I am of the view the personal affairs information is not sensitive as it relates solely to Agency staff performing their professional duties or responsibilities and does not relate to matters concerning their personal or private lives.
- 41. I also note the names and contact information of legal professionals engaged by the Agency are contained in the documents. Again, I accept this is personal affairs information. However, I am not satisfied it would be unreasonable to release the names of external legal professionals. This is because their roles are publicly known (for example, via company websites). Nor do I consider there is any sensitivity in identifying these individuals in connection with litigation as this information has already been disclosed to the Applicant through the court process. Therefore, I consider the public interest in transparency outweighs their personal privacy in this case.
- 42. This view is consistent with the Victorian Supreme Court of Appeal (the **Court of Appeal**) decision of *Victoria Police v Marke*¹⁰ where the Court of Appeal held:

There is, of course, no absolute bar to providing access to documents which relate to the personal affairs of others. The exemption arises only in cases of unreasonable disclosure. What amounts to an unreasonable disclosure of someone's personal affairs will necessarily vary from case to case. ¹¹

- 43. However, I consider the signatures and direct email addresses of persons contained in the documents constitutes personal information and would be unreasonable to release. I do not consider release of this information would aid the Applicant in their understanding of the documents. Nor do I consider this information is widely available. Therefore, I have determined the individuals' personal privacy outweighs the public interest in disclosure in these instances.
- 44. While I note the Agency's submission in relation to section 13 of the *Charter of Human Rights and Responsibilities 2006* (Vic) (**Charter**), and the obligation on public authorities to interpret provisions in Victorian legislation consistent with human rights in the Charter, ¹² I do not consider my decision to disclose personal affairs information of Agency staff and legal professionals contravenes section 13 of the Charter. Disclosure of the information in the documents subject to review is not of a nature that would provide for arbitrary interference with those individuals' 'privacy, family or home' given the personal affairs information has arisen solely in the context of their professional employment with the Agency.
- 45. I am also required to consider whether disclosure of the information would be reasonably likely to endanger the life or physical safety of any person. There is no information before me to suggest this is a relevant consideration.¹³
- 46. Lastly, I note the documents contain the business information of external legal service providers and the Agency. Such information includes their business name, address, telephone number, fax number, email, website, DX address and Australian Business Number (ABN) information. I do not consider this information meets the first limb of the exemption as it does not involve the disclosure of information relating to a person and therefore section 33(1) does not apply.
- 47. Accordingly, I am satisfied section 33(1) applies to the documents. However, in most instances I am not satisfied it would be unreasonable to release the personal affairs information of the individuals already known to the Applicant.

¹⁰ [2008] VSCA 218 in at [76].

¹¹ Ibid.

¹² Section 38 of the Charter

¹³ Section 33(2A).

48. My decision on the application of section 33(1) in relation to each document is set out in the Schedule of Documents at **Annexure 1**.

Deletion of exempt or irrelevant information

- 49. Section 25 requires an agency to grant access to an edited copy of a document when it is practicable for the agency or Minister to delete exempt or irrelevant information and the applicant agrees to receiving such a copy.
- 50. Determining what is 'practicable' requires consideration of the effort and editing involved in making the deletions 'from a resources point of view' and the effectiveness of the deletions. Where deletions would render the document meaningless, they are not 'practicable' and release of the document is not required under section 25.15
- 51. I have considered the effect of deleting irrelevant and exempt information from the documents. In my view, it is practicable for the Agency to delete the irrelevant and exempt information, because it would not require substantial time and effort, and the edited documents would retain meaning.

Conclusion

- 52. On the information available, I am satisfied the exemptions in sections 32(1), 33(1) and 34(1)(b) apply to the documents. I have decided to grant access to the documents in part.
- 53. Where the documents relate to personal affairs information of third parties, who are not specifically identified by the Applicant, this information is irrelevant to the review and should be deleted in accordance with section 25.

Review rights

- 54. If either party to this review is not satisfied with my decision, they are entitled to apply to VCAT for it to be reviewed. 16
- 55. The Applicant may apply to VCAT for a review up to 60 days from the date they are given this Notice of Decision.¹⁷
- 56. The Agency may apply to VCAT for a review up to 14 days from the date it is given this Notice of Decision. 18
- 57. Information about how to apply to VCAT is available online at www.vcat.vic.gov.au. Alternatively, VCAT may be contacted by email at admin@vcat.vic.gov.au or by telephone on 1300 018 228.
- 58. The Agency is required to notify the Information Commissioner in writing as soon as practicable if either party applies to VCAT for a review of my decision.¹⁹

When this decision takes effect

59. I have decided to release documents that contain information relating to the personal affairs of third parties and matters of a commercial nature relating to third party business undertakings.

¹⁴ Mickelburough v Victoria Police (General) [2009] VCAT 2786 at [31]; The Herald and Weekly Times Pty Limited v The Office of the Premier (General) [2012] VCAT 967 at [82].

¹⁵ Honeywood v Department of Human Services [2006] VCAT 2048 at [26]; RFJ v Victoria Police FOI Division (Review and Regulation) [2013] VCAT 1267 at [140] and [155].

¹⁶ The Applicant in section 50(1)(b) and the Agency in section 50(3D).

¹⁷ Section 52(5).

¹⁸ Section 52(9).

¹⁹ Sections <u>50(3F)</u> and (3FA).

60.	The relevant third parties will be notified of my decision and are entitled to apply to VCAT for a
	review within 60 days from the date they are given notice.

61.	For that reason, my decision does not take effect until that 60 day period expires. If a review
	application is made to VCAT, my decision will be subject to any VCAT determination.

Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
1.	[Date]	VCAT Receipt – Filing fee	1	Released in full	Not subject to review	N/A
2.	[Date]	Invoice [number]	3	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • signature is exempt under section 33(1); • the name of external legal adviser to be deleted as 'not relevant' under section 25; • page 2 • the figures in the 'Hours' and 'Rate' columns are exempt under section 34(1)(b); • the name and position title of the external adviser is not relevant; • page 3 • information in the narrative column is exempt under section 32(1); • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and • the name of the external legal adviser is not relevant and is to be deleted under section 25.	Section 32(1): Parts of the document detail tasks performed and narrations that disclose either directly or indirectly, communications concerning matters protected by legal professional privilege between the Agency and its legal advisers. I am satisfied release would disclose information provided for the dominant purpose of providing legal advice and is therefore exempt under section 32(1). However, the remainder, including dollar figures for payments, general statements regarding services rendered and case reference numbers do not reveal this advice and this type of information is therefore not exempt. Section 34(1)(b): For the purposes of this review, I am satisfied the document contains information acquired from a business undertaking. I am also satisfied this information is of a business, commercial or financial nature. The document contains, in part, confidential commercial information regarding the undertaking's charge-out rates. I am satisfied release of the individual charge-out rates in the context of a highly competitive legal services market, would expose the relevant business undertaking unreasonably to disadvantage particularly in circumstances where the proceedings are still on foot. However, information about the total amounts charged over certain periods would not cause a similar disadvantage and as a result, this

Schedule of Documents

Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
						information is not exempt. Section 33(1): The document contains names, signatures and position titles. However, as outlined above, the Applicant advised they only seek access to the personal affairs information of individuals 'known to [them]'. Having considered all the material before me, I am of the view that it would not be unreasonable to release the names of Agency officers contained in the document. However, the signature of the person is exempt under section 33(1) for the reasons set out above. The remaining personal affairs information is a name and position title of an external legal adviser. This individual is not identified by the Applicant as being known to them; therefore,
						this information is not relevant to my review and should be deleted under section 25 as irrelevant information. As set out above, information concerning the business and contact details of the legal service provider and the Agency does not constitute personal affairs information. Section 33(1) does not apply to this
3.	[Date]	Invoice [number]	12	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • signature and direct email address is exempt under section 33(1);	Further to the reasons provided in Document 2 above, I do not consider it unreasonable to release the names and position titles of legal professionals known to the Applicant. I am of the view the personal affairs information is not sensitive as it relates solely to legal professionals performing their paid professional duties in connection with litigation and does not relate to matters

Schedule of Documents

Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
					 the second paragraph contained in the body of the letter is exempt under section 32(1); page 2 the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); the last listed name and position title of the external legal adviser is not relevant and is to be deleted under section 25; pages 3 to 8 the same name of the external legal adviser deleted on page 2 is to be removed under section 25; the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); the information in the narrative column is exempt under section 32(1); pages 10 to 11 information contained in the 'Description' column is exempt under section 32(1); figures contained in the 'Fees' column are exempt under section 34(1)(b); and page 12 third party signature. 	concerning their personal or private life. Further, this information is readily available and published on company websites. Accordingly, section 33(1) does not apply in such circumstances and this information is not exempt.

Schedule of Documents iii

Document	Date of	Document	Number of	Agency's	OVIC Decision OVIC Comments
No.	Document	Description	Pages	Decision	
4.	[Date]	Invoice [number]	6	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 o direct email address is exempt under section 33(1); • page 2 o the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); o the first three and fifth listed names and position titles of external legal advisers are not relevant and are to be deleted under section 25; • pages 3 to 6 o the same names removed on page 2 to be deleted as not relevant under section 25; o the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and o the information in the narrative column is exempt under section 32(1).

Schedule of Documents iv

Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
5.	[Date]	Invoice	3	Refused in full	Release in part	See reasons in Documents 2 and 3 above.
		[number]		Sections 32(1),	Sections 32(1), 34(1)(b), 33(1)	
				33(1), 34(1)(b)	The document is to be released with the following information removed:	
					• page 1	
					 the signature and direct email address is exempt under section 33(1); 	
					• page 2	
					 the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); 	
					• page 3	
					 the figures in the 'Hours' 'Rate' and 'Value' columns, but for the total amount, are exempt under section 34(1)(b); and 	
					 the information in the narrative column is exempt under section 32(1). 	
6.	[Date]	Invoice	3	Refused in full	Release in part	See reasons in Documents 2 and 3 above.
		[number]		Sections 32(1),	Sections 32(1), 34(1)(b), 33(1)	
				33(1), 34(1)(b)	The document is to be released with the following information removed:	
					• page 1	
					 the direct email address is exempt under section 33(1); 	
					pages 1 and 2	
					 the name and position of the external legal adviser is not relevant and to be 	

Schedule of Documents

					removed under section 25; the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b);	
					 page 3 the same name removed on pages 1 and 2 to be removed as not relevant under section 25; the signature to be removed as it is 	
					exempt under section 33(1); the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and	
					 the information in the narrative column is exempt under section 32(1). 	
7.	[Date]	Invoice [number]	11	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the direct email address is exempt under section 33(1); • the second paragraph to be removed as it is exempt under section 32(1); • the signature removed as it is exempt under section 33(1); • page 2	See reasons in Documents 2 and 3 above.

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision		OVIC Decision	OVIC Comments																																																										
						'Value' columns, except for the total amount, are exempt under section 34(1)(b);																																																											
					•	pages 3 to 11																																																											
						 the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and 																																																											
						 the information in the narrative column is exempt under section 32(1). 																																																											
8.	[Date]	Invoice	3	Refused in full		Release in part	See reasons in Documents 2 and 3 above.																																																										
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						 the name of the external legal adviser is not relevant and is to be removed under section 25; 																																																											
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					•	page 2																																																											
									 the name and position of the external legal adviser is not relevant and to be removed under section 25; 																																																								
						 the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); 																																																											
					•	page 3																																																											
						 the same name removed on pages 1 and 2 is to be removed as it is not relevant 																																																											

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision OVIC Comments
					under section 25; the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and the information in the narrative column
					o the information in the narrative column is exempt under section 32(1).
9.	[Date]	Invoice [number]	9	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and direct email address is exempt under section 33(1); • page 2 • the first, second, fifth, seventh, eighth and tenth listed name and position title is not relevant and to be removed under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b);
					 pages 3 to 8 the same names removed on page 2 to be removed as they are not relevant under section 25; the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
					 the information in the narrative column is exempt under section 32(1). 	
10.	[Date]	Invoice [number]	4	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the name of the external legal adviser to be removed as not relevant under section 25; • the direct email address is exempt under section 33(1); • page 2 • the name and position title of the external legal adviser to be removed as it is not relevant under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); • pages 3 to 4 • the same named removed on page 2 is to be removed as it is not relevant under section 25; • the figures in the 'Hours' 'Rate 'and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and	See reasons in Documents 2 and 3 above.
					 the information in the narrative column is exempt under section 32(1). 	

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
11.	[Date]	Invoice [number]	8	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and direct email address is exempt under section 33(1); • page 2 • the third and fourth name listed is not relevant and to be removed under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); • pages 3 to 7 • the same names removed on page 2 to be removed as they are not relevant under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and • the information in the narrative column is exempt under section 32(1).	See reasons in Documents 2 and 3 above. I note that page 8 refers to court filing fees. I am satisfied administrative information such as filing and photocopying fees is not exempt under section 34(1)(b) as it does not reveal the individual charge-out rates of legal service providers. I also note information of a similar character was released to the Applicant by the Agency in Document 1.

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Document Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
12. [Date]	Invoice [number]	4	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the direct email address is exempt under section 33(1); • the name of the external legal adviser is not relevant and to be removed under section 25; • page 2 • the names and position titles of the external legal advisers are not relevant and to be removed under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); • pages 3 to 4 • the names of the external legal advisers to be removed as not relevant under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and • the information in the narrative column is exempt under section 32(1).	See reasons in Documents 2 and 3 above.

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No. Document Description Pages Decision	
See reasons in Documents 2 and 3 a Sections 32(1), 34(1)(b), 33(1), 34(1)(b)	above.

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Document Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
14. [Date]	Invoice [number]	15	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and direct email is exempt under section 33(1); • page 2 • the third, fourth and sixth listed name and position title is not relevant and is to be removed under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); • pages 3 to 13 • the names of the external legal advisers to be removed as not relevant under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and • the information in the narrative column is exempt under section 32(1).	See reasons in Documents 2 and 3 above.

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
15.	[Date]	Invoice [number]	5	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and direct email is exempt under section 33(1); • the second paragraph in the content of the letter is exempt under section 32(1); • page 2 • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); • pages 3 to 5 • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and	See reasons in Documents 2 and 3 above.
					 the information in the narrative column is exempt under section 32(1). 	
16.	[Date]	Invoice [number]	4	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and direct email address is exempt under section 33(1); • the name of the external legal adviser is not relevant and to be removed under	See reasons in Documents 2 and 3 above.

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
					 section 25; page 2 the names and position titles of the external legal advisers are to be removed as they are not relevant under section 25; the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); pages 3 to 4 all names removed on page 2 to be removed as they are not relevant under section 25; the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and the information in the narrative column is exempt under section 32(1). 	
17.	[Date]	Invoice [number]	6	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and direct email address is exempt under section 33(1); • page 2 • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section	See reasons in Documents 2 and 3 above.

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
					 34(1)(b); pages 3 to 6 the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and the information in the narrative column is exempt under section 32(1). 	
18.	[Date]	Invoice [number]	4	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the direct email address is exempt under section 33(1); • page 2 • the third listed name and position title of the external legal adviser is not relevant and to be removed under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); • pages 3 to 4 • the same name removed on page 2 is to be removed as it is not relevant under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total	See reasons in Documents 2 and 3 above.

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
					34(1)(b); and the information in the narrative column is exempt under section 32(1).	
19.	[Date]	Invoice [number]	10	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and email address is exempt under section 33(1); • page 2 • the first, fourth and fifth name and position titles of external legal adviser are to be removed as they are not relevant under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); • pages 3 to 5 • the same names removed on page 2 to be removed as they are not relevant under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); • the information in the narrative column is exempt under section 32(1);	See reasons in Documents 2 and 3 above.

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision OVIC Comments
					 pages 9 to 10 the 'daily fee' and 'hourly rate' is exempt under section 34(1)(b); all information in the 'Time' and 'Fee' columns, except for the total amount, are exempt under section 34(1)(b); all information in the 'Activity' column is exempt under section 32(1); and the signature is exempt under section 33(1).
20.	[Date]	Invoice [number]	4	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the email address is exempt under section 33(1); • pages 1 and 2 • the name and position title of the external legal adviser is to be removed as it is not relevant under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); • pages 3 to 4 • the same name removed on page 2 is to be removed as it is not relevant under section 25;

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision OVIC Comments
					'Value' columns, except for the total amount, are exempt under section 34(1)(b); and o the information in the narrative column is exempt under section 32(1).
21.	[Date]	Invoice [number]	10	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and direct email address is exempt under section 33(1); • the second paragraph in the content of the letter is exempt under section 32(1); • page 2 • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); • pages 3 to 6 • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b);
					 the information in the narrative column is exempt under section 32(1); page 10
					 the 'Daily Fee' and 'Hourly rate' is exempt under section 34(1)(b); all information in the 'Time' and 'Fee'

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments	
					columns, except for the total amount, are exempt under section 34(1)(b);		
					 all information in the 'Activity' column is exempt under section 32(1); and 		
					 the signature is exempt under section 33(1). 		
22.	[Date]	Invoice [number]	5	Refused in full Sections 32(1),	Release in part Sections 32(1), 34(1)(b), 33(1)	See reasons in Documents 2 and 3 above.	
		(number)		33(1), 34(1)(b)	The document is to be released with the following information removed:		
					•	• page 1	
					 the signature and direct email address is exempt under section 33(1); 		
					• page 2		
					 the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); 		
					• pages 3 to 5		
					 the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and 		
					 the information in the narrative column is exempt under section 32(1). 		

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	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
23. [Date]	Invoice [number]	6	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and direct email address is exempt under section 33(1); • page 2 • the second listed name and position title of the external legal adviser is to be removed as it is not relevant under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); • pages 3 to 4 • the same name removed on page 2 is to be removed as it is not relevant under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and • the information in the narrative column is exempt under section 32(1)	See reasons in Documents 2, 3 and 21 above.
				 exempt under section 33(1); page 2 the second listed name and position title of the external legal adviser is to be removed as it is not relevant under section 25; the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); pages 3 to 4 the same name removed on page 2 is to be removed as it is not relevant under section 25; the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and the information in the narrative column 	

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
24.	[Date]	Invoice [number]	4	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and direct and email address is exempt under section 33(1); • page 2 • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); • pages 3 to 4 • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and • the information in the narrative column is exempt under section 32(1).	See reasons in Documents 2 and 3 above.
25.	[Date]	Invoice [number]	16	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and direct and email address is exempt under section 33(1); • page 2 • the fourth, seventh and eighth names and position titles of the external legal adviser are to be removed as they are	See reasons in Documents 2, 3 and 21 above.

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision OVIC Comments
					not relevant under section 25;
					 the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b);
					• pages 3 to 7
					 the same names removed on page 2 are to be removed as they are not relevant under section 25;
					 the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b);
					 the information in the narrative column is exempt under section 32(1);
					• pages 11 and 14
					o the 'Daily Fee' and 'Hourly rate' is exempt under section 34(1)(b);
					 all information in the 'Time' and 'Fee' columns, except for the total amount, are exempt under section 34(1)(b);
					 all information in the 'Activity' column is exempt under section 32(1);
					 the signature is exempt under section 33(1);
					• page 15
					o all information contained in the 'Description' column is exempt under section 32(1); and
					all information in the 'Fees' column, except for total payable amount, is

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
					exempt under section 34(1)(b); o the name and signature of the Approved Clerk is not relevant under 25.	
26.	[Date]	Invoice [number]	4	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and direct email address is exempt under section 33(1); • page 2 • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); • pages 3 to 4 • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and • the information in the narrative column is exempt under section 32(1).	See reasons in Documents 2 and 3 above.
27.	[Date]	Invoice [number]	3	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the direct email address is exempt under section 33(1);	See reasons in Documents 2 and 3 above.

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
					 page 2 the name and position title of the external legal adviser is to be removed as it is not relevant under section 25; the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); page 3 the same name removed on page 2 is to be removed as it is not relevant under section 25; the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and the information in the narrative column is exempt under section 32(1). 	
28.	[Date]	Invoice [number]	3	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and direct email address is exempt under section 33(1); • page 2 • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b);	See reasons in Documents 2 and 3 above.

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision		OVIC Decision	OVIC Comments
					•	page 3 the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and the information in the narrative column is exempt under section 32(1).	
29.	[Date]	Invoice	5	Refused in full		Release in part	See reasons in Documents 2 and 3 above.
		[number]		Sections 32(1),		Sections 32(1), 34(1)(b), 33(1)	
				33(1), 34(1)(b)		The document is to be released with the following information removed:	
					•	page 1	
						 the signature and direct email address is exempt under section 33(1); 	
					•	page 2	
						 the third, fourth and seventh names and position titles of external legal advisers are to be removed as they are not relevant under section 25; 	
						 the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); 	
					•	pages 3 to 5	
						 the same names removed on page 2 are to be removed as they are not relevant under section 25; 	
						 the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and 	

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
					 the information in the narrative column is exempt under section 32(1). 	
30.	[Date]	Invoice [number]	11	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and direct email address is exempt under section 33(1); • page 2 • the fourth name and position title of the external legal adviser is to be removed as not relevant under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); • pages 3 to 6 • the same name removed on page 2 to be removed as it is not relevant under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and • the information in the narrative column is exempt under section 32(1)	See reasons in Documents 2, 3 and 21 above.
					 the 'Daily Fee' and 'Hourly rate' is exempt under section 34(1)(b); 	

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision		OVIC Decision	OVIC Comments								
					0	all information in the 'Time' and 'Fee' columns, except for the total amount, is exempt under section 34(1)(b);									
					0	all information in the 'Activity' column is exempt under section 32(1); and									
					0	the signature is exempt under section 33(1).									
31.	[Date]	Invoice	4	Refused in full		Release in part	See reasons in Documents 2 and 3 above.								
		[number]		Sections 32(1),		Sections 32(1), 34(1)(b), 33(1)									
				33(1), 34(1)(b)	33(1), 34(1)(b)	33(1), 34(1)(b)	33(1), 34(1)(b)	33(1), 34(1)(b)	33(1), 34(1)(b)	33(1), 34(1)(b)	33(1), 34(1)(b)	33(1), 34(1)(b)	Th	e document is to be released with the following information removed:	
				• pag	ge 1										
					0	the signature and direct email address is exempt under section 33(1);									
					• pag	ge 2									
					0	the third listed name and position title of the external legal adviser is to be removed as it is not relevant under section 25;									
					0	the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b);									
					• pag	ges 3 to 4									
					0	the same name removed on page 2 is to be removed as it is not relevant under section 25;									
					0	the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and									

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
					 the information in the narrative column is exempt under section 32(1). 	
32.	[Date]	Invoice [number]	3	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and direct email address is exempt under section 33(1); • the name of the external legal adviser is not relevant and is to be removed under section 25; • page 2 • the name and position title of the external legal adviser is to be removed as not relevant under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); • page 3 • the name removed on page 2 to be removed as it is not relevant under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and	See reasons in Documents 2 and 3 above.
					 the information in the narrative column is exempt under section 32(1). 	

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Document Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
33. [Date]	Invoice [number]	4	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • signature and direct email address is exempt under section 33(1); • page 2 • the fourth listed name and position title of the external legal adviser is to be removed as it is not relevant under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); • pages 3 to 4 • the same name removed on page 2 is to be removed as it is not relevant under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and • the information in the narrative column is exempt under section 32(1).	See reasons in Documents 2 and 3 above.

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Sections 32(1), 34(1)(b), 33(1) Sections 32(1), 34(1)(b), 33(1), 34(1)(b) Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: Page 1
is exempt under section 52(1).

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision		OVIC Decision	OVIC Comments			
35.	[Date]	Invoice	5	Refused in full		Release in part	See reasons in Documents 2 and 3 above.			
		[number]		Sections 32(1), 33(1), 34(1)(b)	•	Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: page 1 the signature and email address is exempt under section 33(1);				
					•	page 2				
						 the first listed name and position title of the external legal adviser is to be removed as not relevant under section 25; 				
									 the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); 	
						pages 3 to 4				
						 the same name removed on page 2 is to be removed as not relevant under section 25; 				
								 the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and 		
						 the information in the narrative column is exempt under section 32(1). 				

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
36.	[Date]	Invoice [number]	2	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and email address is exempt under section 33(1); • page 2 • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and • the information in the narrative column is exempt under section 32(1).	See reasons in Documents 2 and 3 above.
37.	[Date]	Invoice [number]	8	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and email address is exempt under section 33(1); • the second paragraph in the content of the letter is exempt under section 32(1); • page 2 • the fourth listed name and position title of the external legal adviser is to be removed as it is not relevant under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total	See reasons in Documents 2, 3 and 21 above.

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments		
					amount, are exempt under section 34(1)(b); • pages 3 to 4			
					 the same name removed on page 2 is to be removed as not relevant under section 25; 			
					 the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); 			
					 the information in the narrative column is exempt under section 32(1); 			
					• pages 6 to 7			
					 all information contained in the 'Description' column is exempt under section 32(1); and 			
					 all information in the 'Fees' column, except for total payable amount, is exempt under section 34(1)(b); and 			
					 the signature is exempt under section 33(1); 			
38.	[Date]	Invoice	3	Refused in full	Release in part	See reasons in Documents 2 and 3 above.		
		[number]		Sections 32(1), 33(1), 34(1)(b)			Sections 32(1), 34(1)(b), 33(1)	
					The document is to be released with the following information removed:			
					• page 1			
					 the signature and email address is exempt under section 33(1); 			
					• pages 1 and 2			
					 the names and position titles of the 			

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
					external legal advisers is to be removed as not relevant under section 25; the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); page 3 the same name removed on page 2 is to be removed as not relevant under section 25; the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and the information in the narrative column is exempt under section 32(1).	
39.	[Date]	Invoice [number]	7	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and email address is exempt under section 33(1); • second paragraph in the content of the letter to be removed under section 32(1); • page 2 • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b);	See reasons in Documents 2 and 3 above. I note a third-party business undertaking has provided consent to the release of its business, commercial and financial information. Accordingly, this information is not exempt under section 34(1)(b) and should be released to the Applicant.

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision OVIC Comments			
					pages 3 to 4 the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); the information in the narrative column			
					is exempt under section 32(1); • page 6 to 7			
					o the signature of the third party is exempt under section 33(1).			
40.	[Date]	Invoice	5	Refused in full	Release in part See reasons in Documents 2 and 3 above.			
		[number]		Sections 32(1), 33(1), 34(1)(b)	Sections 32(1), 34(1)(b), 33(1)			
					33(1), 34(1)(b)	33(1), 34(1)(b)	The document is to be released with the following information removed:	
						• page 1		
							 the signature and direct email address is exempt under section 33(1); 	
						 the second paragraph contained in the content of the letter is exempt under section 32(1); 		
							• page 2	
					 the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); 			
					• pages 3 to 5			
					o the figures in the 'Hours' 'Rate' and			

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments				
					'Value' columns, except for the total amount, are exempt under section 34(1)(b); and					
					 the information in the narrative column is exempt under section 32(1). 					
41.	[Date]	Invoice	6	Refused in full	Release in part	See reasons in Documents 2 and 3 above.				
		[number]		Sections 32(1),	Sections 32(1), 34(1)(b), 33(1)					
				33(1), 34(1)(b)	33(1), 34(1)(b)	33(1), 34(1)(b)	33(1), 34(1)(b)	33(1), 34(1)(b)	The document is to be released with the following information removed:	
					• page 1					
				 the signature and direct email address is exempt under section 33(1); 						
						 the second paragraph contained in the content of the letter is exempt under section 32(1); 				
					• page 2					
								 the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); 		
					• pages 3 to 6					
					 the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and 					
					 the information in the narrative column is exempt under section 32(1). 					

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	Date of ocument	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
42. [[[Date]	Invoice [number]	3	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and direct email address is exempt under section 33(1); • pages 1 and 2 • the names and position titles of the external legal advisers are not relevant and are to be removed under section 25; • page 2 • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); • page 3 • the same names removed on page 2 are to be removed as not relevant under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and • the information in the narrative column is exempt under section 32(1).	See reasons in Documents 2 and 3 above.

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
43.	[Date]	Invoice [number]	3	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and direct email address is exempt under section 33(1); • the second paragraph contained in the content of the letter is exempt under section 32(1); • page 2 • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); • page 3 • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and • the information in the narrative column is exempt under section 32(1).	See reasons in Documents 2 and 3 above.
44.	[Date]	Invoice [number]	6	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the direct email address is exempt under section 33(1);	See reasons in Documents 2 and 3 above.

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
					 pages 1 and 2 the names and position titles of external legal advisers to be removed as not relevant under section 25; page 2 the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); pages 3 to 5 the same names removed on page 2 to be removed as not relevant under section 25; the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and the information in the narrative column is exempt under section 32(1). 	
45.	[Date]	Invoice [number]	9	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and direct email address is exempt under section 33(1); • the second paragraph contained in the content of the letter is exempt under section 32(1);	See reasons in Documents 2 and 3 above.

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision OVIC Comments
					 page 2 the first and fifth listed names and position titles of external legal advisers are to be removed as not relevant under section 25;
					 the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b);
					 pages 3 to 9 the same names removed on page 2 to be removed as not relevant under section 25;
					 the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and
					 the information in the narrative column is exempt under section 32(1).
46.	[Date]	Invoice [number]	8	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and direct email address is exempt under section 33(1); • the second paragraph contained in the content of the letter is exempt under
					section 32(1); • page 2 o the figures in the 'Hours' 'Rate' and

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision OVIC Comments										
					'Value' columns, except for the total amount, are exempt under section 34(1)(b);										
					• pages 3 to 8										
					 the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and 										
					the information in the narrative column is exempt under section 32(1).										
47.	[Date]	Invoice	4	Refused in full	Release in part See reasons in Documents 2 and 3 above.										
		[number]		Sections 32(1), 33(1), 34(1)(b)											Sections 32(1), 34(1)(b), 33(1)
														The document is to be released with the following information removed:	
					• page 1										
					 the signature and direct email address is exempt under section 33(1); 										
					pages 1 and 2										
					 the name and position title of the external legal adviser is not relevant and to be removed under section 25; 										
					o the figures in the 'Hour' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b);										
					• pages 3 to 4										
					 the same name removed on pages 1 and 2 to be removed as not relevant under section 25; 										
					o the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total										

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision OVIC Comments
					amount, are exempt under section 34(1)(b); and o the information in the narrative column is exempt under section 32(1).
48.	[Date]	Invoice [number]	6	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and direct email address is exempt under section 33(1); • the second paragraph contained in the content of the letter is exempt under section 32(1); • page 2 • the fifth listed name and position title to be removed as it is not relevant under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); • pages 3 to 6 • the same name removed on page 2 is to be removed as not relevant under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision OVIC Comments
					 the information in the narrative column is exempt under section 32(1).
49.	[Date]	Invoice [number]	10	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and direct email address is exempt under section 33(1); • page 2 • the ninth and eleventh listed names and position titles of external legal advisers are to be removed as they are not relevant under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); • pages 3 to 10 • the same names removed on page 2 to be removed as not relevant under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and • the information in the narrative column is exempt under section 32(1).

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Document No. Date of Document Document No. Document Description Number of Pages Agency's Decision OVIC Decision	OVIC Comments
See reasons in D Refused in full Sections 32(1), 33(1), 34(1)(b), 33(1) The document is to be released with the following information removed: page 1 the page 1 and 2 the mames and position titles of external legal advisers are not relevant and are to be removed under section 25; page 2 the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); pages 3 to 4 the same names removed on page 2 to be removed as not relevant under section 25; the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and the information in the narrative column is exempt under section 32(1).	Documents 2 and 3 above.

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
No. 51.	[Date]	Invoice [number]	Pages 18	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and direct email address is exempt under section 33(1); • page 2 • the first, fourth and eighth listed names and position titles of external legal advisers are to be removed as they are not relevant under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); • pages 3 to 12 • the same names removed on page 2 to be removed as not relevant under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); • the information in the narrative column is exempt under section 32(1); • page 13 • the name of the trust account is not	See reasons in Documents 2, 3 and 21 above.
					relevant and is to be removed under section 25;	

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
					 pages 14 to 15 information contained in the 'Description' column is exempt under section 32(1); the figures contained in the 'Fees' column, except for total payable amount, are exempt under section 34(1)(b); and pages 16 and 18 the signatures are exempt under section 33(1). 	
52.	[Date]	Invoice [number]	17	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and direct email address is exempt under section 33(1); • page 2 • the sixth and ninth listed names and position titles of external legal adviser are not relevant and are to be removed under section 25; • the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); • pages 3 to 12 • the same names removed on page 2 to be removed as not relevant under	See reasons in Documents 2, 3 and 21 above.

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
					section 25; the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); the information in the narrative column	
					is exempt under section 32(1);	
					 pages 16 to 17 the 'Daily Fee' and 'Hourly Rate' listed are exempt under section 34(1)(b); 	
					 the information contained in the 'Activity' column is exempt under section 32(1); 	
					 the figures contained in the 'Fee' column, except for the total amount, are exempt under section 34(1)(b); and 	
					 the signature is exempt under section 33(1). 	
53.	[Date]	Invoice [number]	15	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and direct email address is exempt under section 33(1); • page 2 • the third, fourth, fifth and seventh listed names and position titles of external legal advisers are not relevant and are	See reasons in Documents 2, 3 and 21 above. I note a third-party business undertaking has provided consent to the release of its business, commercial and financial information. Accordingly, this information is not exempt under section 34(1)(b) and should be released to the Applicant.

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision		OVIC Decision	OVIC Comments
					,	the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b);	
					•	pages 3 to 9	
						 the same names removed in page 2 to be removed as not relevant under section 25; 	
						the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b);	
						 the information in the narrative column is exempt under section 32(1); 	
					•	pages 11 to 12	
						 information contained in the 'Particulars' column is exempt under section 32(1); 	
						 the signature is exempt under section 33(1); 	
					•	pages 13 to 14	
						 information contained in the 'Description' column is exempt under section 32(1); 	
						 the figures contained in the 'Fees' column, except for the total amount, are exempt under section 34(1)(b); and 	
						 the signature is exempt under section 33(1). 	

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Document No.	Date of Document	Document Description	Number of Pages	Agency's Decision	OVIC Decision	OVIC Comments
54.	[Date]	Invoice [number]	5	Refused in full Sections 32(1), 33(1), 34(1)(b)	Release in part Sections 32(1), 34(1)(b), 33(1) The document is to be released with the following information removed: • page 1 • the signature and direct email address is exempt under section 33(1);	See reasons in Documents 2 and 3 above.
					 page 2 the third listed name and position title of the external legal adviser is not relevant and is to be removed under section 25; the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); pages 3 to 5 	
					 the same name removed on page 2 to be removed as not relevant under section 25; the figures in the 'Hours' 'Rate' and 'Value' columns, except for the total amount, are exempt under section 34(1)(b); and the information in the narrative column is exempt under section 32(1). 	

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