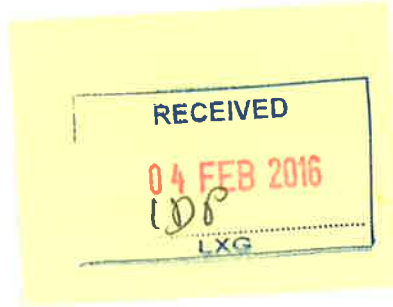


Incorporating  
**Lethbridge & McGowan**

**Our Ref:** MSR:LM:141251  
**Your Ref:**  
**Reply to:** ALBURY OFFICE

3 February, 2016

**Attention: Mr I Pridgeon**  
Russell Kennedy  
DX 494  
MELBOURNE VIC



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[www.kellmoore.com.au](http://www.kellmoore.com.au)

Dear Sir

**Hurst Earthmoving Pty Ltd v Towong Shire Council - VCAT Ref No. P143/2015**

Please find **enclosed** by way of service five (5) copies of the following documents:

1. Expert Statement of Evidence of Steve Schutt of Hansen Partnership dated January 2016;
2. Expert Witness Report of Malcolm Bromley of Oxley & Company dated 29 January 2016;
3. Expert Witness Report of Jason Walsh of Traffix Group dated 27 January 2016;
4. Expert Witness Report of Barry Cook of GHD dated 28 January 2016;
5. Expert Statement of Evidence of John Glossop of Glossop Town Planning dated January 2016.

We note your advice that Council's Expert pavement engineer report may not be provided to us on 3 February 2016 and if not, it will be provided to us on 4 February 2016. In these circumstances we seek your undertaking that you will not disclose the content of the Applicant's Expert pavement engineers report until such time as Council's pavement engineer's report is provided to us.

Yours faithfully  
**KELL MOORE**

Per:

**Andrew Brickhill**  
Lawyer  
Email: [abrickhill@kellmoore.com.au](mailto:abrickhill@kellmoore.com.au)