By Hugh Stowe

The uncertain ethical expert witness preparation

'Witness preparation is treated as one of the dark secrets of the legal profession. The resulting lack of rules, guidelines, and scholarship has created significant uncertainty about the permissible types and methods of witness preparation.'[1]

frontiers of

Expert witness preparation remains a source of ethical angst for many lawyers. The pressure to act ethically with respect to expert witness preparation begs the question: what is the nature of the ethical duty? There is a troubling divergence in both practice and attitudes with respect to the limits of lawyer involvement in the preparation of expert evidence.

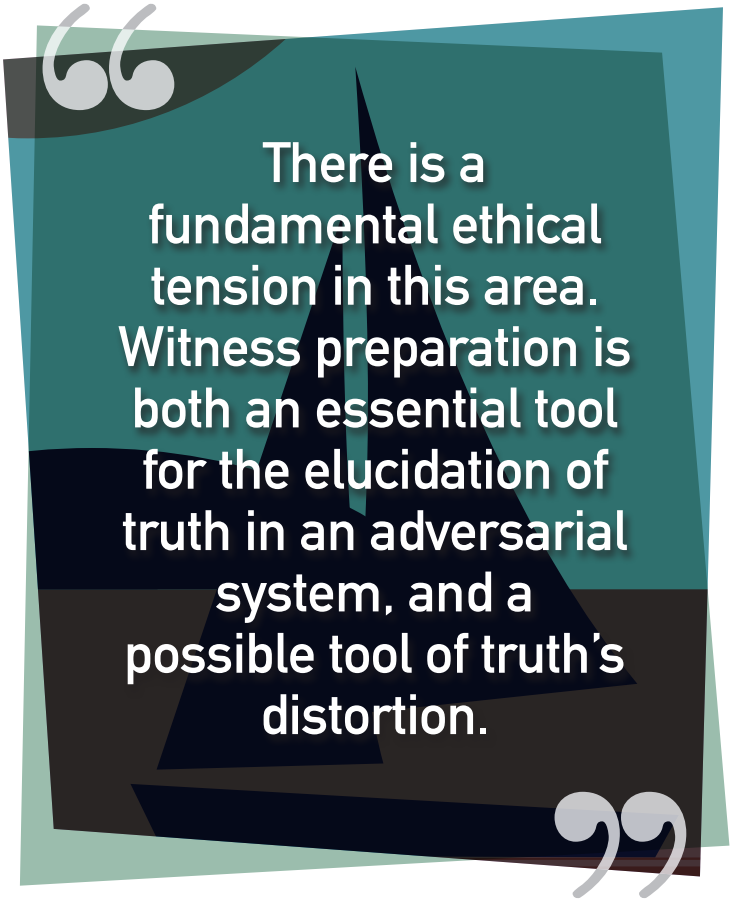
This article does not purport to provide an authoritative statement of the ethical boundaries of expert witness preparation, but sets out some parameters and proposals.

For the purpose of this article, 'witness preparation' is used to mean 'any communication between a lawyer and a prospective witness … that is intended to improve the substance or presentation of testimony to be offered at a trial or other hearing'.[2]

INHERENT IMPORTANCE OF EXPERT WITNESS PREPARATION

Under reg 35 of the *Legal Profession Uniform Conduct (Barristers) Rules 2015* (NSW) (*Rules*): 'A barrister must promote and protect fearlessly and by all proper and lawful means the client's best interests to the best of the barrister's skill and diligence.'

Consultation with (and preparation of) experts is an important part of the discharge of that ethical duty.[3] The ethical importance of witness preparation is reinforced by a consideration of the adversarial nature of our justice system. Witness preparation is an integral aspect of the partisan case development upon which adversarial justice depends because at least some degree of witness preparation is required for 'a coherent and reasonably accurate factual presentation'.[4]



INHERENT DANGERS OF EXPERT WITNESS PREPARATION

> 'For whatever reason, and whether consciously or unconsciously, the fact is that expert witnesses instructed on behalf of parties to litigation often tend … to espouse the cause of those instructing them to a greater or lesser extent'.[5]

This is a reflection of 'adversarial bias', that is, a 'bias that stems from the fact that the expert is giving evidence for one party to the litigation'.[6] That bias may arise from:

- 'selection bias' (a party will only present an expert whose opinions are advantageous to the party's case);
- 'deliberate partisanship' (an expert deliberately tailors evidence to support the client); and/or
- 'unconscious partisanship' (an expert unintentionally moulds his or her opinion to fit the case).

The NSW Law Reform Commission recently observed that adversarial bias is 'a significant problem', despite the fact that its prevalence is difficult to quantify.[7]

Aspects of witness preparation unquestionably have the capacity to facilitate 'deliberate partisanship' and exacerbate the insidious process of 'unconscious partisanship'. Consciously or unconsciously, lawyers may convey signals to the expert which may generate 'subtle pressures to join the team – to shade one's views, to conceal doubt, to overstate nuance, to downplay weak aspects of the case that one has been hired to bolster'.[8] The difficulty of detecting adversarial bias exacerbates the insidious nature of the problem.

TENSION BETWEEN CONFLICTING POLICY OBJECTIVES

There is a fundamental ethical tension in this area. Witness preparation is both an essential tool for the elucidation of truth in an adversarial system, and a possible tool of truth's distortion.[9] It is an example of the fundamental tension generally underlying the professional regulation of lawyers: that 'barristers owe their paramount duty to the administration of justice'[10] but '[a] barrister must promote and protect fearlessly and by all proper and lawful means the client's best interests'.[11]

LEGAL PROFESSION UNIFORM CONDUCT (BARRISTERS) RULES 2015

Witness preparation is regulated under the *Rules*.

Reg 69 provides:

> 'A barrister must not:
> (a) *advise or suggest* to a witness that *false or misleading evidence* should be given nor condone another person doing so, or
> (b) *coach* a witness *by advising* what answers the *witness should give* to questions which might be asked' [emphasis added].

Reg 70 provides:

> 'A barrister does not breach rule 69 by expressing a general admonition to tell the truth, or by *questioning and testing* in conference the version of evidence to be given by a prospective witness, including drawing the witness's attention to *inconsistencies or other difficulties with the evidence*, but must *not encourage* the witness to give evidence *different from the evidence which the witness believes to be true*' [emphasis added].

Regs 69 and 70 of the *Rules* are somewhat confusingly structured, but can be summarised as follows:

- a general prohibition in reg 69 ('advise or suggest'; 'coach');
- a safe harbour from that prohibition in reg 70 ('questioning and testing'); and
- a qualification to the safe harbour in reg 70 (but 'must not encourage' etc).

There is ambiguity in the prohibitions under regs 69 and 70 around 'advise or suggest', 'coach', and 'encourage'. They are inherently open-textured standards. Further, they beg questions as to whether infringement of those prohibitions may be constituted by indirect implication; and if so what level of indirect implied effect is sufficient to trigger the prohibition (noting that almost any course of dealing with any witness has inherent capacity to trigger deliberate or unconscious adversarial bias by the expert).

I suggest that the words in reg 69(b) should be construed as conduct that (expressly or by implication) conveys the 'answers the witness should give' in a manner that creates an undue risk that evidence will be corrupted by adversarial bias.[12]

I suggest that the assessment of undue risk requires a balance between the conflicting policy objectives referred to above. Factors relevant to that balance may include:

- The inherent capacity of the conduct to encourage or facilitate the formulation and presentation of expert opinion advantageous to the party's case.
- The inherent capacity of the conduct to corrupt expert opinion through the operation of adversarial bias.

- The extent to which the legitimate objectives of facilitating the formulation and presentation of advantageous opinion can be achieved through strategies with less inherent capacity to corrupt expert opinion.
- Specific contextual considerations relevant to the extent of the risk of corruption of opinion through adversarial bias. These may include:
  - the experience and stature of the expert, within the expert's discipline and relative to the lawyer;[13]
  - whether the course of dealing with the expert has demonstrated a willingness or tendency to be unduly swayed by suggestion;
  - whether the subject matter of the opinion is one in which there is significant scope for open-textured judgment calls, such that modified opinions can be plausibly rationalised; or
  - the nature and extent of any incentives for the expert positively to assist the instructing party.[14]

THE CASELAW

There are inconsistent lines of authority relating to the ethical limits of lawyer involvement in the preparation of expert reports.[15] The only High Court authority on this issue comprises an *obiter dicta* by a single justice.[16]

THE STRATEGIC DIMENSION

Strategic considerations overlay ethical considerations when considering the appropriate limits of expert witness preparation.

Notwithstanding that particular strategies of witness preparation may satisfy a theoretical test for ethical propriety, the following considerations demand strategic caution about the limits of prudent witness preparation:

- First, many cases affirm that 'the guiding principle must be that care should be taken to avoid any communication which may undermine, or appear to undermine, the independence of the expert',[17] and 'To the extent that expert evidence is not or is not seen to be the uninfluenced product of the expert, it may be not only incorrect but "self-defeating"'.[18] An expert report may be excluded (or the weight attached to it severely diminished) if there is perceived to be undue lawyer involvement in report preparation.[19]
- Secondly, there is a significant risk of privilege being impliedly waived in relation to all dealings with an expert,[20] and circumstances that support the inference that expert independence has been compromised support the likelihood of a waiver.[21]

BRIEFING THE EXPERT

The following are some of the ethical and strategic considerations that are relevant to selected aspects of expert witness preparation:

- *Assistance in the formulation of instructions*. There is no ethical difficulty in consulting with the expert in relation to giving instructions. However, such consultation carries strategic risks, as referred to above.
- *Preparation of report without formal instructions*. Once an expert is engaged, it is 'good practice' to provide formal written instructions, and the failure to do so 'has the potential to give the impression that something ulterior is going on',[22] such as falsely conveying that the report was prepared in response to the letter of instructions.[23]
- *False or incomplete instructions*. It would be unethical to present a case on the basis of an expert report when the expert was briefed on assumptions that contradict material facts known by the party (or where facts known to be material have been omitted from the instructions).[24]
- *Preliminary conferences*. There is no ethical problem with extensive conferring to discuss and test the preliminary opinions of experts prior to the preparation of a first draft. Some practitioners recommend this, to prevent the generation of a paper trail of draft reports that disclose the meandering evolution of the final opinion. I suggest that any conferring should be consistent with the guidelines suggested under point 2 below.

AMENDING THE DRAFT REPORT

You have received a draft report. It is hopeless. What can you do? There are three issues:

1. Comments as to the form of the report

There is strong judicial support in Australia for the ethical propriety (and professional duty) of lawyers being involved

> Recent cases mandate that it is ethically unsatisfactory (and destructive of the expert's credibility) for the expert to fail to disclose the nature and extent of the lawyer's involvement in the drafting process.

in ensuring the clear and admissible expression of expert opinion.[25] This principle has been held to extend to:

- ensuring that the language of the report is 'accessible and comprehensible';[26] and
- 'advising or suggesting … that a different form of expression might appropriately or more accurately state the propositions that the expert would advance'.[27]

This position contrasts with the position in the UK. In what remains a leading UK case on the ethical limits of a lawyer's involvement in the preparation of expert reports, Lord Wilberforce held: 'Expert evidence presented to court should be, and should be seen to be, the independent product of the expert, *uninfluenced as to form* or content by the exigencies of litigation' [emphasis added].[28] In a subsequent case, Lord Denning relied on that statement to conclude that lawyers must not 'settle' the evidence of medical reports.[29]

2. Comments as to substance of opinion

There is conflicting authority about the ethical limits of involvement by lawyers in the substance of expert opinion.

There are many strict statements of principle prohibiting involvement,[30] but such scrupulous detachment from engagement is inconsistent with practice in NSW, inconsistent with the broad scope under the *Rules* to 'test' evidence, and inconsistent with the weight of authority which explicitly embraces at least some engagement in relation to the substance of opinion. There is clear judicial support for the following practices:

- identifying 'the real issues for the expert';[31]
- excluding 'irrelevant material';[32]
- indicating 'when the report fails to direct itself to the real issues';[33]
- 'advising or suggesting, not only which legal principles apply';[34]
- ensuring 'that any opinion expressed by an expert is an opinion the expert holds for the reasons that the expert gives';[35] and
- directing attention to 'significant contradictions, errors and gaps in reasoning'.[36]

On the other hand, with respect to engagement with experts about the substance of their opinion, it is prohibited to:

- 'advise or suggest to a witness that false or misleading evidence should be given';[37]
- 'coach a witness by advising what answers the witness should give';[38]
- prepare a draft for consideration by experts, in the absence of detailed prior instructions from the expert;[39]
- involve the expert in discussions concerning strategy;[40]
- arrange for conferences with multiple experts, at least 'before they had committed their views to writing';[41] and
- 'distort the substance of the witness's opinion so that it loses its essential character as an independent report unaffected as to form or content by the exigencies of litigation'.[42]

In light of those principles, I explore below some areas for which there is ethical uncertainty.

Testing an unfavourable draft opinion

Although there is no clear authority, I suggest there should be no ethical restraint on testing unfavourable draft opinion, supported by reg 70 of the *Rules*. I suggest that this testing may relate to the appropriateness of assumptions; the soundness of the reasoning; and the correctness of the conclusion.[43]

However, consistent with the prohibition on 'advising [directly or indirectly] what answers the witness should give' in reg 69, I suggest that the process of testing should proceed only by way of open-ended questions, which simply direct attention to an issue, and which avoid (as much as possible) suggestion that the opinion is wrong and should be changed. For example: 'What are the assumptions for that proposition?' 'What is the basis for those assumptions?' 'Do you consider those assumptions consistent with A, B, C? How?' 'What reasoning supports the drawing of that conclusion from those assumptions?' It should not proceed by way of closed questions which explicitly or implicitly suggest that the expert should change his opinion, such as: 'I suggest that the reasoning is wrong, because of A, B, C. Do you agree?'

Raising contrary propositions for consideration

This is moving into even murkier ethical waters. I suggest that this practice is ethically permissible (and strategically prudent) if the following procedure is followed:

- The lawyer has first undertaken the open-ended 'testing' of the expert's opinion described above, and the expert has not independently expressed an opinion consistent with the contrary proposition.
- Open-style questioning is adopted. For example, 'What is your opinion about [proposition X]? What is the basis for that opinion?', and then the opinion is 'tested' in the manner described above.
- The lawyer does not engage in conduct that has the intention or consequence of pressuring the expert to adopt a particular proposition. Factors that may be relevant to determine whether there is pressure include the extent to which any question is expressed in a leading manner; the extent to which the question is repeated; the extent to which the lawyer personally advocates the merits of the proposition; the extent to which the lawyer highlights the strategic importance of the proposition to the case; the extent to which the lawyer seeks to argue with the expert about the proposition (as distinct from testing the expert's opinion by open-ended questioning); and the relative statures of the expert and lawyer (which may affect the power dynamic between them).
- If the expert purports to adopt the proposition, the lawyer rigorously tests the basis for it, to ensure that the expert is capable of reasonable justification.

The practice of raising contrary propositions unquestionably generates a risk of at least unconscious adversarial bias. However, I suggest that the practice is ethically permissible for the following reasons:

- First, putting alternative propositions to the expert (in accordance with the guidelines proposed) technically falls within the safe harbour of 'testing' in reg 70.
- Secondly, there is a profound ethical distinction between raising a proposition for consideration, and either 'advising what answers the witness should give' (reg 69) or 'encouraging the witness to give evidence different from the evidence the witness believes to be true' (reg 70).
- Thirdly, if the suggested guidelines are followed, the risk of adversarial bias is substantially mitigated.[44]

All that said, it is obvious that the mere fact of a lawyer raising a proposition for consideration has inherent suggestive capacity, which generates the possibility of the corruption of opinion through adversarial bias. There is scope for divergent views about the ethical propriety of such a practice.

3. Direct involvement in the drafting process

The authorities referred to in point 1 above affirm the ethical legitimacy of the lawyer's involvement in the actual drafting process (as distinct from mere discussions with

the expert). However, irrespective of the integrity of a lawyer's involvement in the preparation of a draft, the mere fact that a lawyer has crafted the words of the report may stain its perceived independence and persuasive impact.[45] Consequently, there will remain significant strategic advantage in avoiding or minimising a lawyer's involvement in drafting. The appropriate role of a lawyer may depend on the lawyer's assessment of the capacity of the expert to craft an opinion in admissible and persuasive form without assistance.

Set out below is my personal suggestion as to where the line should be drawn in relation to various aspects and stages of drafting.

Preparing the first draft

While it is strongly arguable that there is no ethical impropriety under the *Rules* in the lawyer preparing the first draft (in conference or alone) based on instructions received from the expert, considerations of strategic prudence strongly dictate that the expert should typically prepare the first draft alone. A lawyer drafting the report 'poses the serious risk of compromising the independence of the expert and of undermining the value of the opinion'.[46]

Comments on the first draft

It is common and (I suggest) acceptable for lawyers to submit to experts a marked-up version of the first draft, which contains queries of the type described under point 2 above, requests for the elaboration of reasoning in the draft, and invites the expert to prepare a further draft in light of those queries and requests.[47]

Preparing subsequent drafts

I suggest that the ethical and strategic balance swings in favour of active participation of the lawyer in the drafting process (preferably in conference with the expert, or even alone based on comprehensive instructions), when the substance of the opinion is effectively settled and recorded in a draft, and the focus is on the refinement of form and expression. I suggest guidelines for this process elsewhere.[48] If the lawyer ever does draft revisions alone (on instruction), I strongly recommend providing the revised draft in an email saying something to this effect:

> '… I have endeavoured to ensure that the revisions are consistent with your instructions in conference. However, please check the revisions very carefully, and ensure they accord precisely with the substance of your opinion and your preferred form of expression, and make all necessary revisions to ensure that is the case.'

Disclosure of involvement

Recent cases mandate that it is ethically unsatisfactory (and destructive of the expert's credibility) for the expert to fail to disclose the nature and extent of the lawyer's involvement in the drafting process. This is a critical new development in this area of practice.[49]

GENERAL ADVICE ABOUT THE PROCESS OF EVIDENCE

It is standard practice and acceptable for lawyers to give witnesses general advice as to courtroom procedure, courtroom demeanour, and general methods for the presentation of testimony (in examination-in-chief and cross-examination).[50]

REHEARSAL OF CROSS-EXAMINATION

Rehearsal relates to the process of 'mock' cross-examination of the expert, prior to the giving of evidence.

This is an area where there is extreme inconsistency between common law jurisdictions around the world, and powerful ethical considerations weighing for and against the practice, both of which I elaborate on elsewhere.[51]

It is an area on which there is very little Australian authority, although there is one strong judicial warning against the practice.[52] Nevertheless, the practice is widespread.

I personally advocate for the ethical appropriateness of the practice, primarily because:

- It facilitates the presentation of testimony that does justice to the inherent merits of the opinion. The mere experience of formulating and articulating opinion under the pressure of rehearsed cross-examination will likely improve the general quality of the presentation of testimony during cross-examination at trial. It facilitates the development of strategies to combat various standard techniques of cross-examination, which might otherwise cause the testimony of an expert to appear weaker than is warranted by the inherent merits of the expert's opinion.[53]
- While there is inherent risk that the process of mock cross-examination may be suggestive of the answers the witness should give and thereby risks adversarial bias, that risk is reduced in relation to expert evidence.[54]

Nevertheless, in view of the uncertain ethical status of (and potential judicial sensitivity towards) this practice, strategic prudence arguably dictates that the wily crafts of cross-examination be demonstrated and rehearsed by reference to a hypothetical fact scenario unrelated to the case. If rehearsal of cross-examination on the expert's report does proceed, then I recommend following these guidelines:

- The lawyer should emphatically exhort the expert to abide by the witness codes.
- On no occasion should the lawyer give any direction or suggestion as to the substance of any answer that the expert should provide to any question.
- It is reasonable to discuss answers given in the mock cross-examination for the purpose of: (a) exploring and testing the basis for any stated answer; (b) exploring whether any answer (on further reflection) truly accords with the considered opinion of the expert; (c) if not, exploring why the expert gave the answer in the mock cross-examination; and (d) discussing strategies to facilitate the expert responding to questions in accordance with the expert's considered opinion.
- There should be limited repetition of cross-examination on each subject.

I am interested in exploring this topic further, and welcome comments. ■

This article is based on a previous article by Hugh Stowe: 'Preparing expert witnesses – a (continuing) search for ethical boundaries', *Bar News*, Spring 2018, 72–81.

Notes: **1** JS Applegate, 'Witness preparation', *Texas Law Review*, Vol. 68, 1989, 279. **2** Ibid, 278. **3** See further H Stowe, 'Preparing expert witnesses – a (continuing) search for ethical boundaries', *Bar News*, Spring 2018, 72–81 at 73. **4** Applegate, above note 1, 352. **5** *Abbey National Mortgages plc v Key Surveyors Nationwide Limited and Others* [1996] 3 All ER 184; see also *Fox v Percy* (2003) 214 CLR 118, [151] (Callinan J). **6** NSW Law Reform Commission, *Report 109*: *Expert witnesses* (2005) 70. **7** Ibid, 74. **8** Ibid, 73, quoting J Langbein, 'The German advantage in civil procedure', *University of Chicago Law Review,* Vol. 52, 1985, 823 at 835. **9** Applegate, above note 1, 341. **10** NSW Government, 'Principles', *Legal Profession Uniform Conduct (Barristers) Rules 2015* (4 March 2022) 4(a). **11** Ibid, reg 35. **12** Further consideration of the construction of these standards is set out in above note 3. **13** Suggestibility will be influenced by the 'power dynamic' between expert and the lawyer. **14** For example, a contingency fee. **15** For a good review, see G Blake SC and P Doyle Gray, 'Can counsel settle expert reports?', *Bar News*, Summer 2012–3, 56–66. This was approved in *Hunter Quarries Pty Ltd v Morrison* [2013] NSWIRComm 49, [86]–[97]; and *Cassie Masters by her tutor William Masters v Sydney West Area Health Service* [2013] NSWSC 228, [33]. But see cautionary comments in Stowe, above note 3, 74. **16** *Boland v Yates Property Corporation Pty Ltd* [1999] HCA 64; 167 ALR 575 *(Boland)*, [279] (Callinan J). **17** *Phosphate Co-operative Co of Australia Pty Ltd v Shears* [1989] VR 665 (*Phosphate*), 683; affirmed in *New Aim Pty Ltd v Leung* [2022] FCA 722 (*New Aim*), [65]; *Yelland Security Pty Ltd v Plus Architecture International Pty Ltd* [2021] VSC 416 (*Yelland*); see also *Whitehouse v Jordan* [1981] 1 WLR 246, 256. **18** *Yelland,* above note 17, [378] (Nichols J). **19** For example, *R v Doogan* [2005] ACTSC 74, [117]; *Phosphate,* above note 17; *Secretary to the Department of Business and Innovation v Murdesk Investments Pty Ltd* [2011] VSC 581, [101]–[111]; *Universal Music Australia Pty Ltd v Sharman Licence Holdings Pty Ltd* (2005) 220 ALR 1, [227]; *Hardy v Your Tabs Pty Ltd* [2000] NSWCA 150, [133]; *New Aim,* above note 17; *Yelland,* above note 17. **20** See H Stowe, 'Expert reports: Reconsidering waiver of privilege', *Bar News*, Spring 2018, 62–71, 68. **21** Ibid. **22** *Landel Pty Ltd v Insurance Australia Ltd* [2021] QSC 247 *(Landel)*, [35] (Dalton J). **23** *New Aim,* above note 17, [74]; *Phosphate,* above note 17. **24** *Bush* (1993) 69A Crim R 416, 431. **25** *Harrington-Smith on behalf of the Wongatha People v Western Australia (No. 7)* [2003] FCA 893 (*Harrington-Smith*), [19] (Lindgren J). This case has been repeatedly affirmed: eg, *Akiba on behalf of the Torres Strait Islanders of the Regional Seas Claim Group v State of Queensland (No. 2)* [2010] FCA 643 (Finn J). **26** *Landel,* above note 22, [19]; *Boland,* above note 16. **27** *Boland,* above note 16; *Hunter Quarries Pty Ltd v Morrison (No. 2)* [2013] NSWIRComm 98, [94]. **28** *Whitehouse v Jordan* [1981] 1 WLR 246, 256–7 (Lord Wilberforce). **29** *Kelly v London Transport Executive* [1982] 1 WLR 1055, 1064–5 (Lord Denning). However, Callinan J has pointed out *Whitehouse v Jordan* does not support 'as far reaching a proposition as that propounded by Lord Denning': *Boland,* above note 16. **30** *Harrington-Smith*, above note 25, [19] (often quoted with approval); *Landel,* above note 22, [19]; *Whitehouse v Jordan* [1981] 1 WLR 246, 256. **31** *Cross on Evidence* (electronic version, LexisNexis, current to March 2022), [29080], quoted with approval in *New Aim*, above note 17, [68]. **32** *Landel,* above note 22, [19]. **33** Above note 31. **34** *Boland,* above note 16. **35** *Traderight (NSW) Pty Ltd (ACN 108 880 968) v Bank of Queensland Ltd (ACN 009 656 740) (No. 14)* [2013] *and 13 related matters* NSWSC 211 (*Traderight*), [23] (Ball J); also *Harrington-Smith*, above note 25, [19], which was quoted with approval in *Jango v Northern Territory of Australia (No. 2)* [2004] FCA 1004, [9] (Sackville J) and in *R v Doogan* [2005] ACTSC 74, [118]. **36** *Landel,* above note 22, [21]; *New Aim*, above note 17, [68]; *Re Equiticorp Finance Ltd; Ex parte Brock (No. 2)* (1992) 27 NSWLR 391(*Equiticorp*), 395; *Majinski v the State of Western Australia* [2013] WASCA 10 (*Majinski*), [30]. **37** Reg 69 of the *Rules*. **38** Ibid; *Equiticorp,* above note 36, 395; *Majinski*, above note 36, [32]. **39** *New Aim*, above note 17. **40** *Phosphate,* above note 17. **41** *Landel,* above note 22, [26]. **42** Above note 31. **43** This is consistent with the decision of Ball J in *Traderight*, above note 35, [23]. **44** However, it could be contended that merely raising the proposition is indirectly suggestive of what the witness 'should say' in proceedings. **45** See above note 17. **46** *New Aim*, above note 17, [69] (McElwaine J). **47** Some practitioners prefer to organise a conference to discuss the matters raised, before a further draft is prepared. **48** Stowe, above note 3, 78. **49** *New Aim*, above note 17; *Hudspeth v Scholastic Cleaning and Consultancy Services Pty Ltd (No. 8)* [2014] VSC 567. **50** *Equiticorp,* above note 36, 395. For a good example of such guidelines, see I Freckleton and H Selby, *Expert Evidence: Law, Practice, Procedure and Advocacy*, 2nd ed, Lawbook Company, 2002, 706–13. **51** Stowe, above note 3, 79. **52** *Equiticorp*, above note 36, 395 (Young J). **53** Ibid, for the elaboration of those strategies. **54** Ibid.

Hugh Stowe is a barrister at 5 Wentworth Chambers, Sydney.
EMAIL hugh.stowe@5wentworth.com.