

Friday, 16 October 2026

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(10.00 am)

CLERK: Good morning, everyone.

The fire alarm due to be tested at 10 am.

It should only last about a minute, and then I will proceed and read the restriction order. Thank you.

(Pause)

Good morning.

This an OPEN hearing of the Independent Inquiry into matters relating to Afghanistan. Please ensure that all mobile phones and other personal electronic devices are either switched off or in silent mode.

Please may I also draw your attention to the fact that the Chair of the Inquiry, the Right Honourable Lord Justice Haddon-Cave, has made a general restriction order for Inquiry hearings which applies to the conduct of those who are attending and/or viewing this hearing. The relevant parts of that order are contained within the specific restriction order made in respect of these hearings which is displayed on the Inquiry website and on the door of this hearing room, but I will summarise its purpose.

The first part of the general restriction order for Inquiry hearings prohibits any person from making an audio or video recording of Inquiry proceedings without

1 the express permission of the Chair. Furthermore, no
2 person may take a photograph in any room in which
3 Inquiry proceedings are taking place and at a time the
4 Inquiry is sitting, without the express permission of
5 the Chair.

6 The second part of the general restriction order
7 for Inquiry hearings which applies to this hearing
8 arises as the live-stream of these Inquiry proceedings
9 via YouTube will purposely be subject to a ten-minute
10 delay. Where those who have supplied evidence to the
11 Inquiry have applied to restrict information from
12 publication outside of the Inquiry, in some instances
13 the Chair has made restriction orders the effect of
14 which is to protect that information. The Chair has
15 also made a restriction order prohibiting the use,
16 publication or dissemination of certain information that
17 is contained within the evidence and documents
18 associated to these hearings. That restriction order is
19 displayed on the door of the hearing room and copies or
20 available on request.

21 Where material is restricted, it is redacted, and,
22 where appropriate, a gist of the evidence is provided.
23 In the event that something is said during the course of
24 this hearing which may breach a restriction order made
25 by the Chair, the evidence may be halted and the hearing

1 room may be cleared for CLOSED legal submissions as to
2 whether any restriction order has been breached, and the
3 live stream YouTube recording will be temporarily
4 stopped for this period.

5 Counsel to the Inquiry or the Solicitor to the
6 inquiry must be informed of any request to make an
7 application for a restriction order. If an application
8 is made for a restriction order in relation to anything
9 that has been said or done in the hearing Inquiry room
10 in the preceding ten minutes, anything that was said or
11 done during that period is subject to a restriction
12 order prohibiting its disclosure, repetition or
13 duplication until the Chair has finally determined the
14 application.

15 For the avoidance of doubt, where material or
16 identities in documents shown on screen or subsequently
17 published have been redacted, with or without an
18 overwritten gist, the redacted material is restricted,
19 and it is a breach of the restriction order to disclose
20 what is thought to have been redacted.

21 All of the above orders are subject to a penal
22 notice. This means that any breach of any element of
23 the restriction orders may be certified to the High
24 Court or the Court of Session, who will have the power
25 to fine or imprison anyone found to have been in breach

1 of the order.

2 Thank you.

3 **Remarks by the CHAIR**

4 SIR CHARLES HADDON-CAVE: Mr Gray, on Friday, 25 September,
5 three weeks ago, as you will recall, I held an OPEN
6 hearing regarding the MOD discovery that a very large
7 tranche of documents was on the DAS system which had not
8 been looked at. You sought to reassure me on that
9 occasion, and I am reading from the transcript:

10 "On the basis of relatively conservative
11 estimates, the MOD estimated disclosure from these
12 97 million files to the Inquiry, based on previous
13 experience, of approximately 1,200 further documents,
14 [although] we would stress that this figure could end up
15 being very much lower than given the assumptions
16 applied."

17 I understand that was based on Ms Mackie's letter
18 from GLD of 24 September. MOD had rerun some -- the
19 same phase 3A e-word searches against the new tranche of
20 DAS documents, compared those with the pre-July upload,
21 and the delta was 16,890 files.

22 Then, applying the historical relevance percentage
23 of 6.5 per cent to a rounded up figure of 20,000, one
24 arrived at a figure which was said to be
25 a "conservative" estimate of 1,230 documents.

1 Then, on the basis of ten paralegals brought in to
2 review 20,000 documents, at 150 documents a day, that
3 equals 14 working days, which is about three weeks,
4 I was assured by GLD that the Inquiry timetable would
5 not be affected.

6 On 9 September, a further letter arrived from
7 Ms Mackie. I am now told that the figure for review is
8 not 16,890 files but nearly double that.

9 MR GRAY: Sir, that was 9 October.

10 SIR CHARLES HADDON-CAVE: 9 October, forgive me.

11 The figure for review is not 16,890 files but
12 nearly double that, 31,966 files "because many of the
13 documents included a significant number of attachments".

14 I was also told in the letter that DAS was having
15 problems exporting the container files, as they are
16 called, i.e. with more than one attachment, and that was
17 taking longer, but AIRU had "surged in paralegals",
18 authorised over time, and anticipated disclosure by
19 mid-November, which is four weeks away.

20 You will appreciate my continuing concern. I've
21 got a public inquiry to run and I would like to know
22 five things, please.

23 First, whether the document review with the
24 paralegals has started, what the daily run rate is, and
25 whether it's matching the target of 150 per day.

1 Secondly, what the current situation is regarding
2 the extraction and export from DAS of the "container
3 files".

4 Third, what account has been taken as regards of
5 dealing with the zip files that I gather also feature.
6 Will these yield even more documents?

7 Fourth, that documents which are or will be
8 uploaded to Relativity are being properly flagged. You
9 will recall I raised that point before.

10 Finally, your assurance that there will be no more
11 surprises and a check has been run to ensure that there
12 are no more buried archived tranches of documents
13 elsewhere.

14 All right? So can you help me with those points,
15 please.

16 **Submission on behalf of THE MINISTRY OF DEFENCE**

17 MR GRAY: Sir, thank you. As you know, I appear on behalf
18 of the Ministry of Defence.

19 SIR CHARLES HADDON-CAVE: Indeed.

20 MR GRAY: Sir, we were grateful for the directions you
21 issued this week, on Tuesday, specifying the matters
22 upon which you would be assisted by submissions today,
23 which are reflected in, sir, those five points which you
24 have just set out.

25 Sir, I had intended to address you on two issues.

1 Firstly, the DAS upload matters which you've just
2 alluded to, but secondly, in light of the letter from
3 Tuesday from Mr Doggart, also, sir, an update regarding
4 the provision by the Ministry of Defence of its
5 submissions in response to Professor McCormack's written
6 document regarding the law of armed conflict.

7 SIR CHARLES HADDON-CAVE: I was going to raise that in due
8 course.

9 MR GRAY: We can deal with that maybe in due course.

10 Sir, shall I deal firstly with the DAS matters
11 that you have just referenced?

12 SIR CHARLES HADDON-CAVE: Yes, please.

13 MR GRAY: Sir, by way of brief background, and as explained
14 on 25 September, the upload in July of the material
15 which included the 97 million files dated 2010 to 2013
16 was an upload of an electronic document and records
17 management system called the Hewlett Packard Records
18 Manager, or HPRM as it has been referred to.

19 Sir, in responding to your questions, and at the
20 outset of this hearing, can I please reiterate the
21 following points which I tried to make clear on
22 25 September.

23 The issue here is not a failure to disclose
24 97 million files to the Inquiry, nor does it mean the
25 MOD has suddenly identified 97 million files which are

1 likely to be relevant to the Inquiry's work. Sir, the
2 issue, as you well understand, is that this additional
3 volume of data is now capable of being searched for
4 potentially relevant material. Whether it will in fact
5 materially assist the relatively narrow focus of the
6 Inquiry's work is a separate issue. And indeed, for the
7 various reasons explained in Ms Mackie's letter to which
8 you have referred and which has been published by the
9 Inquiry and at the hearing on 25 September, it remains
10 clear that the vast majority of this material will be
11 wholly irrelevant to the Inquiry's work.

12 Sir, as I will explain shortly, the review work
13 carried out to date on this material, which, to answer
14 your first question, has started, only serves to support
15 that assessment.

16 Sir, in Ms Mackie's letter, and at the hearing on
17 25 September, the Ministry of Defence's proposed course
18 of action into reviewing that upload was set out -- sir,
19 you have summarised it -- and we were grateful, on
20 Monday, 28 September, for the Inquiry's prompt
21 confirmation that it was content for the Ministry of
22 Defence to proceed on that basis. Thank you.

23 Sir, as you have already referenced, the rerunning
24 of those keyword searches resulted in an additional
25 16,890 files being returned, as Ms Mackie anticipated.

1 As explained in the update letter of 9 October, sir,
2 which you have referred to in your opening remarks,
3 those 16,890 files have been subsequently found to
4 include 628 what are described as container files, i.e.
5 files containing more than one file.

6 Sir, as happened in the previous phase 3A
7 disclosure exercise, those container files were not
8 immediately extracted and exported by the DAS because
9 that process, as we understand the Inquiry knows, is
10 a more time-consuming process, which would have delayed
11 the extraction and export of the other file types.

12 Sir, in response to your question 2, for further
13 information regarding those container files, the
14 Ministry of Defence anticipates, based on information
15 supplied by those managing the DAS, to be able to
16 provide an update on the timescale for the extraction
17 and export of those container files by 4 pm on 23
18 October, so within one week of today.

19 In addition, sir, to that information around
20 timescale, it is also anticipated that we will be able
21 to provide you with a total file count, which of course
22 will also be able to feed into a much more realistic
23 assessment of what is likely to be involved with those
24 container files. But, sir, those are 628 of the 16,890
25 files which were returned by these searches.

1 Sir, if I may now return to the remaining
2 16,262 files. Before being extracted by DAS, the
3 Ministry of Defence and the Inquiry have an established
4 agreement in place that certain file types can be
5 excluded before those search returns are reviewed.

6 Sir, as was explained in previous correspondence,
7 there are then various logistical steps required to be
8 undertaken to enable the extracted material to be moved
9 to a Ministry of Defence main building and uploaded to
10 the Ministry of Defence's Inquiry e-disclosure platform
11 for relevance review by a team of paralegals retained by
12 the Ministry of Defence.

13 Sir, that process, of removal of excluded file
14 types, extraction, export, and transfer to the main
15 building were completed in the week commencing
16 5 October 2026.

17 Sir, as Ms Mackie explained, after the files are
18 uploaded to the e-disclosure platform within main
19 building, a de-duplication process is then carried out.
20 But, prior to the document review, the number of
21 documents, as opposed to files, to be reviewed normally
22 increases, because embedded documents, and in particular
23 attachments to emails, for example, are separated out
24 and need to be separately reviewed.

25 The planning assumption, sir, to which you have

1 made reference in your opening remarks was calculated by
2 reference to previous experience in the
3 phase 3A exercise. That assumption was that the process
4 would result in an 80 per cent increase but, sir, as you
5 have already referred to, in fact on this occasion
6 a larger number of documents fell to be separated, and
7 the effect of that was that the number of documents
8 falling to be reviewed is, as you have already said,
9 31,966.

10 Sir, those various processes were completed by
11 Friday, 9 October, as set out in the GLD update letter
12 of that date to you enabling the review work to have
13 commenced promptly at the beginning of this week, which
14 it in fact did.

15 Sir, as explained in the update letter of
16 9 October, and as you have already referred to, the MOD,
17 through AIRU, has both increased the number of
18 paralegals allocated to review work, drawing on resource
19 elsewhere, and also authorised overtime to enable more
20 work to be done each day by each paralegal.

21 Sir, yesterday, by way of example, there were
22 16 paralegals allocated to the task. Sir, as you have
23 referred to, the original assumption was based on ten,
24 and the MOD has been able to allocate 60 per cent
25 additional paralegal resource to this exercise.

1 Sir, there have now been four full days of
2 first-level review work carried out in respect of those
3 documents. It is ongoing as we sit here.

4 As at the end of the working day yesterday -- and,
5 sir, this data was only available first thing this
6 morning -- the paralegal team have so far reviewed
7 15,484 of those documents, approximately 48 per cent.
8 Sir, it's 15,484.

9 Sir, regarding the daily rate, and I could give
10 you the figures for each day if necessary, but it's
11 noticeable that on Monday, for example, there were
12 2,262 documents reviewed. As the team has got into the
13 exercise, that number has increased. But as things
14 stand and I anticipate, by this time the process will be
15 more than 50 per cent complete of reviewing those
16 documents.

17 That first-level review, sir, turning to the
18 relevance rate to which you have already referred, has
19 so far identified 372 documents as potentially relevant.
20 That equates to a relevance rate for this exercise of
21 2.4 per cent, significantly lower than the
22 6.15 per cent, sir, you referred to already in the
23 original exercise.

24 The fact that the relevance rate for this exercise
25 is even lower than the original exercise, provides

1 further support, in my submission, for the assessments
2 both that the HPRM material is very unlikely to contain
3 a significant volume of relevant material, let alone
4 material, to use your term, sir, of real relevance to
5 the Inquiry's work, and also that it is unlikely to
6 imperil the Inquiry's timetable.

7 Sir, if this relevance rate stays constant for the
8 remainder of the current review exercise, this will
9 result, so far as the 31,966 documents are concerned, in
10 approximately 770 documents requiring second-level
11 review before disclosure to the Inquiry. Even assuming
12 all those documents fall to be disclosed, this would be
13 both a considerably smaller number of documents than
14 anticipated in Ms Mackie's letter and, we submit,
15 plainly manageable within the existing timetable.

16 Sir, the Ministry of Defence considers that, on
17 any view, it has made good progress in reviewing this
18 new material. The anticipated timetable set out in the
19 9 October letter to which you have referred was that the
20 first-level review be concluded by 30 October. You will
21 recall, sir, in Ms Mackie's letter it was anticipated
22 that the paralegal review might take three weeks on the
23 basis of those assumptions. On the basis that by the
24 end of today within one week more than 50 per cent of
25 the material will be reviewed -- so we are optimistic

1 that the first-level review will be completed more
2 quickly than Ms Mackie assumed based on her
3 calculations.

4 There is then a second-level review process to be
5 conducted. One week has been allowed for that. That,
6 effectively, is a review of the material returned
7 through the first-level review, by more senior members
8 of the team, and then the material needs to be disclosed
9 to the Inquiry using the usual processes.

10 Sir, to answer your question about current rate of
11 progress and anticipated timetable, the answer is that
12 the timetable as set out by the Ministry of Defence on
13 9 October very much remains on track, and it's hoped
14 that we will beat the date set out in that letter.

15 Sir, that was what I planned to say in respect of
16 your first four questions. Sir, regarding your fifth,
17 about whether or not there will be any further surprises
18 in relation to archives of material, sir, in your letter
19 of Tuesday sent by Mr Doggart, sir, you asked when the
20 Ministry of Defence anticipates being able to provide
21 a more substantive update on what material relating to
22 the conflict in Afghanistan has and has not been
23 uploaded to the DAS.

24 Sir, again by way of brief background, in
25 paragraph 18 of Ms Mackie's letter, the Ministry of

1 Defence made clear, for the avoidance of any doubt, that
2 it remains the case that there is material from
3 Operation Herrick that has not been transferred onto the
4 DAS. This includes a very large quantity of computer
5 hard drives and media items returned from Afghanistan
6 which have not been prioritised for upload. Again, as
7 the Ministry of Defence made clear through Ms Mackie's
8 letter, the process of uploading media items is
9 technically complicated and challenging, very
10 time-consuming and, in some cases, may not in fact be
11 technically possible.

12 Sir, again, as submitted on 25 September, I do
13 wish to reiterate that this is not to say such material
14 necessarily relates to the work of the Inquiry. As
15 I submitted, sir, to you on 25 September, the scale and
16 duration of the Afghan campaign generally, the number of
17 personnel deployed across it, and the amount of data
18 generated as a result, inevitably dwarf the relatively
19 narrow focus of this Inquiry's work. Also, the material
20 record and uploaded onto the DAS from Afghanistan does
21 not include UKSF IT systems.

22 However, as we also made clear on 25 September,
23 it's plainly important that both Ministry of Defence and
24 the Inquiry understand to the fullest extent possible
25 the extent and nature of this material so that informed

1 assessments and decisions can be made. Sir, I can
2 assure you today that this issue is being taken very
3 seriously by the Ministry of Defence.

4 Since 25 September, a number of meetings have
5 taken place with those responsible for managing the DAS,
6 and a site visit has also taken place. The purpose of
7 those meetings and site visit to better understand DAS
8 holdings.

9 Sir, the permanent undersecretary has been briefed
10 on these issues, and he has tasked the Chief Digital and
11 Information Officer within the Ministry of Defence with
12 considering alternative options for making more material
13 accessible in the short term.

14 There is, therefore, proactive engagement with
15 this issue in the most senior echelons of the Ministry
16 of Defence.

17 Sir, to answer the question in your letter, and by
18 implication the question 5 that you posed me regarding
19 the DAS, given the complexity of the task as well as a
20 desire to provide helpful and meaningful information to
21 you, the Ministry of Defence anticipates being in
22 a position to provide a more substantive update on what
23 material relating to the conflict in Afghanistan has and
24 has not been uploaded to the DAS by 4 pm on Friday,
25 20 November. That is a period of five weeks.

1 Sir, that period is considered necessary to enable
2 two parallel workstreams to make substantive progress.
3 First, a fuller audit of the DAS holdings, current
4 accessibility of those holdings, and what steps can be
5 taken by the DAS and the MOD, potentially, to remedy or
6 improve that accessibility.

7 Secondly, in parallel, the scoping of alternative
8 options involving a range of technical and commercial
9 discussions.

10 Sir, within that five-week period it is also
11 anticipated that the output of those workstreams can be
12 properly considered so as to permit a reasonable,
13 realistic and achievable plan to be formulated. And so
14 we anticipate that, so far as any next steps are
15 concerned, they will be considered and implemented in
16 full consultation with the Inquiry.

17 Sir, regarding that first issue of the DAS, those
18 were the submissions I intended to make to you, which
19 I trust address the five questions you have posed.

20 SIR CHARLES HADDON-CAVE: Thank you, Mr Gray.

21 Can I be clear that the zip files are included in
22 your submissions about the container files?

23 MR GRAY: Yes, sir. Sorry if that wasn't clear, but we
24 consider those to be part of the container file issue.

25 SIR CHARLES HADDON-CAVE: Indeed, because we have always --

1 many of us have been snookered by zip files in the past.

2 Thank you for those submissions and those
3 reassurances. You will understand why I raised these
4 issues and am looking for as much clarity as possible.
5 I understand there's a lot of work going on. What
6 I would like to do is to have a further update in
7 a fortnight's time, when we have an OPEN hearing, and we
8 will schedule something in for those dates -- for that
9 date, Friday fortnight.

10 If there is any change to any of the parameters
11 which you have set out this morning, I would like very
12 quickly for Mr Doggart to be updated.

13 MR GRAY: Sir, can I just make clear on that point, we are
14 receiving daily updates from the paralegal review team,
15 and there is daily consideration of progress. And if
16 there is any material change, we will of course notify
17 the Inquiry.

18 SIR CHARLES HADDON-CAVE: Good.

19 I am grateful for that, Mr Gray. Thank you very
20 much indeed for that update.

21 Could we deal with the second issue, which I think
22 can be dealt with quite briefly. The second issue is
23 the question of the MOD submissions on the law of armed
24 conflict. There's quite a background to this. An
25 extension was sought.

1 The position is that this has been an issue which
2 has been live for quite some time. An extension was
3 sought in a recent letter. The extension was sought on
4 1 October with the deadline on 2 October for the MOD
5 supplied submissions on LOAC, but I gather this morning,
6 at 9.29, the submissions of the MOD on LOAC have been
7 received. I won't go into the details of why that
8 particular issue about delay was of concern to me, but
9 you can confirm, can you, that the submissions were
10 submitted this morning?

11 MR GRAY: Sir, yes, that is right.

12 Sir, in your letter of Tuesday you did seek an
13 explanation to be given today as to why that deadline of
14 2 October not been met.

15 SIR CHARLES HADDON-CAVE: I don't need that explanation
16 given the fact that the submissions have now been
17 received.

18 MR GRAY: Sir, as you have acknowledged, there is an
19 involved background to this issue which will take quite
20 a long time to go through.

21 SIR CHARLES HADDON-CAVE: Indeed, and we've got lots to get
22 on with today. Could I just say this, and echo the
23 words of Mr Justice Chamberlain in a recent judgment of
24 9 October in R (Fry) v Secretary of State for Defence
25 that in another case, paragraph 34:

1 "It is difficult to avoid the impression that the
2 [MOD] in this case have come to regard procedural
3 directions as optional ..."

4 As I've said earlier, I've got a public inquiry to
5 run, these deadlines are extremely important, and, as
6 Mr Justice Chamberlain observed, the failure by one
7 party to meet a deadline may cause unfairness to other
8 parties, it disrupts plans, and parties should not
9 assume that an extension, even a short one, will be
10 immaterial, and it's absolutely critical that if
11 applications are made for extensions, they should be
12 made well before the deadlines in question. This
13 application was made on the eve of the deadline running
14 out and it's not the first time. So I would be very
15 grateful if what Mr Justice Chamberlain said in that
16 case can be borne in mind here.

17 MR GRAY: Sir, yes. Regarding those observations, obviously
18 the factual situation in that case was very different to
19 the one here.

20 Sir, on the LOAC issue, you will be aware that the
21 indication was that the Inquiry submissions from
22 Professor McCormack would be received by us in the
23 spring.

24 SIR CHARLES HADDON-CAVE: I know all that.

25 MR GRAY: They arrived at the beginning of August or late

1 July and that caused problems.

2 SIR CHARLES HADDON-CAVE: Indeed.

3 MR GRAY: The indication was 12 weeks would be required.

4 That would take us to today, for a whole host of

5 reasons --

6 SIR CHARLES HADDON-CAVE: As I said, Mr Gray, we don't need

7 to go into all that. We have a job to do today. I just

8 want the general approach to be that deadlines really

9 matter. We've got an inquiry to run and it's very

10 important that everybody works together to achieve those

11 deadlines so we can move on.

12 MR GRAY: Sir, can I make one final submission on deadlines,

13 which I was going make in response to your letter.

14 Sir, lest there be any doubt about it, the

15 deadlines you set, sir, are accorded with respect. They

16 are not treated as optional or treated with any degree

17 of casual disregard. Sir, as you've just referenced,

18 what is required, which has been fostered successfully

19 to date in my submission, is clear and effective

20 communication and collaboration to ensure the Inquiry

21 can move forward promptly.

22 Sir, I simply make this plea in relation to

23 deadlines: what the Ministry of Defence has consistently

24 sought is as much notice as possible of what work is

25 likely to be required of it in the future. Receiving

1 Rule 9 requests without any advance notice, with
2 a deadline, and without any ability to prepare for that
3 work, necessarily requires an already busy team to act
4 reactively rather than with a planned approach. That
5 can often require additional capacity to be found at
6 short notice and necessarily, therefore, for matters to
7 be dealt with, as I said, reactively rather than in
8 a constructive planned approach.

9 On the occasions where advance notice has been
10 provided by your team, the position has been
11 ameliorated. I simply, in the spirit of what you have
12 just referred to, would urge that there is that clear
13 and prompt communication so that everyone can plan the
14 way forward as effectively -- and work together as
15 effectively and efficiently as possible.

16 As I said, sir, at the end of the last hearing,
17 the Ministry of Defence remains very grateful for the
18 positive and constructive working relationship that has
19 been fostered with the Inquiry. We wish to maintain it
20 and also to assist the Inquiry in discharging its
21 important terms of reference.

22 SIR CHARLES HADDON-CAVE: Indeed, Mr Gray, there are regular
23 meetings between the solicitors' teams, there are
24 regular meetings between counsel, and I can assure you
25 that the Inquiry team do everything in their power to

1 give as much advance notice of workstreams as they
2 possibly can.

3 MR GRAY: Thank you.

4 SIR CHARLES HADDON-CAVE: Those discussions and regular
5 collaboration will continue, but I return to my basic
6 point: I have an Inquiry to run, these deadlines are
7 incredibly important. It's not always possible to give
8 a lot of advance warning but as much warning as possible
9 will always be given.

10 MR GRAY: Thank you.

11 SIR CHARLES HADDON-CAVE: And has been. And I appreciate
12 there's a lot of work involved and there are lot of
13 people on the MOD side and elsewhere working hard to try
14 to assist this Inquiry, and I would encourage that to
15 continue. The Inquiry team are always available for any
16 discussions that required if and when problems occur.

17 MR GRAY: Sir, thank you.

18 SIR CHARLES HADDON-CAVE: All right.

19 Well, thank you very much indeed. I will rise
20 now. We have had the fire alarm test and we will
21 reconvene, Mr Polnay, in a few minutes.

22 MR POLNAY: Thank you very much.

23 SIR CHARLES HADDON-CAVE: Thank you very much, Mr Gray.

24 **(10.38 am)**

25 **(The hearing continued: see separate transcript)**

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