



An independent association of Equitable Life Members & Policy-Holders funded by subscription

**Equitable Members Action Group**

By Email, Fax and post

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Kentish Town  
London NW5 2LL

10<sup>th</sup> October, 2005

Dear Mr Plant,

**In the matters of Equitable Life**  
**and 11 former directors: Claim 2002 F406**

We had correspondence about witness statements in April, at the time of the commencement of the trial. That culminated in an unsigned letter to me from HS (21 April) that included the following:

“In any event, The Society’s view is that, for reasons include logistical considerations, it does not intend to meet requests for copies of documents in the trial bundle which have been referred to in open Court.”

This seemed to be a quite extraordinary position for HS to take. Notwithstanding, I now wish to make a formal request on EMAG’s behalf springing from Mike Arnold having appeared in the witness box today in Court 76 and having entered his sworn testimony. EMAG would now like to receive a copy of the redacted Mike Arnold witness statements, please. Further, in today’s exchanges very extensive cross examination Mr Headdon lent heavily on the witness statements of the expert actuary witness statements of both Mr Dumbreck and Mr Cryan, which we also ask for copies, please. Finally, EMAG requests formally a copy of your expert witness, David Law’s statement, which was formally entered on September 19 and was subject to cross-examination over the next four days.

I hope the HS will, under the changed circumstances, now agree to be compliant and provide EMAG swiftly, preferably in digitised form, with the four documents requested - which could and should now be regarded as in the public domain.

Yours sincerely,

Paul Braithwaite  
General secretary, EMAG  
CC: Peter Lane