

List of documents on matters relating to the disposal of the Hunghom Peninsula PSPS development  
between Cheung, Chan & Chung, Solicitors and Notaries ("CCC") and the Administration  
during the period from November 2002 to December 2004  
(in chronological order)

| THB No.                    | Documents   | Passed to (including the officer to whom the letter concerned was marked for his attention) or copied to (that can be identified on file)   |
|----------------------------|---|---|
| <del>THB-250</del><br>T156 | Letter dated 20 May 2003 from CCC to the then Chief Executive of the HKSAR, the then Secretary for Housing, Planning and Lands ("SHPL"), the Housing Authority ("HA") and the Lands Department. The letter dated 10 June 2002 referred in paragraph 23 of this letter has already been provided under <del>THB-113</del> T108 | CEO : Tung Chee-hwa, Robin Ip*, Herman Tse*<br>HPLB : Michael Suen, Thomas Tso*<br>HA/HD : CM Leung, Vincent Tong, Simon Lee, Anthony Wong, Handa Lam, Rosaline Wong, Flora Leung<br>LD : Patrick LC Lau, JS Corrigan, James Merritt, Susan Ku  |
| <del>THB-251</del><br>T157 | Letter dated 12 June 2003 from the then Administrative Assistant to SHPL to CCC   | CEO : Robin Ip, Herman Tse*<br>LD : Patrick LC Lau, JS Corrigan<br>HA/HD : CM Leung, Handa Lam, HW Lau  |
| <del>THB-40</del><br>T38   | Writ of Summons (endorsed with the Statement of Claim) issued by CCC for and on behalf of the developer of the Hunghom Peninsula development on 25 July 2003  | LD : AL Robertson, Francis Ng, James Merritt, JS Corrigan*, Susan Ku*<br>HA/HD : CM Leung, Vincent Tong, Anthony Wong, Handa Lam, NM Chan Doris Ma, Peggy Chan, Amy Chan*, CS Chan, Loretta Yu* Josephine Shu*, Ada Fung*, Ivan Chan, KY Wu, HW Lau<br>DoJ : Anthony Wu, Simon Lee, Gregory Payne |
| <del>THB-316</del><br>T199 | Letter of 26 August 2003 from DoJ to CCC  | HA/HD : Handa Lam<br>DoJ : Simon Lee, Cathy Wong  |
| <del>THB-317</del><br>T200 | Letter of 27 August 2003 from CCC to DoJ  | DoJ : Gregory Payne   |
| <del>THB-318</del><br>T201 | Letter of 1 September 2003 from CCC to Johnson, Stokes & Master, Solicitors & Notaries ("JSM") and DoJ [Note : JSM was the then HA's solicitors for the pending proceedings.]   | DoJ : Gregory Payne   |
| <del>THB-319</del><br>T202 | Letter of 2 September 2003 from DoJ to CCC (copied to JSM)  | DoJ : +   |

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|----------------------------|--|---|
| <del>THB 348</del><br>T231 | Notice to Act issued by DoJ dated 3 September 2003 in respect of the pending proceedings and which was served on CCC and JSM   | DoJ : +   |
| <del>THB 349</del><br>T232 | Summons dated 3 September 2003 issued by DoJ which was served on CCC and JSM   | DoJ : +   |
| <del>THB 320</del><br>T203 | Letter of 5 September 2003 from DoJ to CCC (copied to JSM)   | DoJ : +   |
| <del>THB 321</del><br>T204 | Letter of 22 October 2003 from DoJ to CCC (copied to JSM)  | DoJ : +   |
| <del>THB 350</del><br>T233 | Request for Further and Better Particulars dated 22 October 2003 issued by DoJ   | DoJ : +   |
| <del>THB 322</del><br>T205 | Letter of 23 October 2003 from DoJ to CCC  | DoJ : +   |
| <del>THB 323</del><br>T206 | Letter of 30 October 2003 from DoJ to CCC  | DoJ : +   |
| <del>THB 324</del><br>T207 | Letter of 1 November 2003 from CCC to DoJ  | HA/HD : Handa Lam<br>DoJ : Simon Lee, Gregory Payne   |
| <del>THB 325</del><br>T208 | Letter of 5 November 2003 from CCC to JSM and DoJ  | DoJ : Gregory Payne   |
| <del>THB 326</del><br>T209 | Letter of 6 November 2003 from CCC to DoJ (enclosing a copy of CCC's letter to JSM of 6 November 2003 which was copied to DoJ) | DoJ : Gregory Payne   |
| <del>THB 327</del><br>T210 | Consent Summons dated 6 November 2003 in respect of the pending proceedings  | DoJ : Gregory Payne   |
| <del>THB 328</del><br>T211 | Letter of 25 November 2003 from DoJ to CCC   | DoJ : +   |

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|----------------------------|--|---|
| <del>THB-329</del><br>T212 | Defence of the 2 <sup>nd</sup> Defendant (Secretary for Justice (on behalf of the Government of the Hong Kong Special Administrative Region)) in respect of the pending proceedings which was filed on 1 December 2003, forwarded by DoJ to HA/HD and LD | DoJ : Simon Lee, Gregory Payne<br>HA/HD : Vincent Tong, Handa Lam, Peggy Chan, HW Lau, NM Chan, Amy Chan<br>LD : AL Robertson*            |
| <del>THB-330</del><br>T213 | Letter of 24 December 2003 from CCC to DoJ, forwarded by DoJ to LD   | DoJ : Gregory Payne<br>LD : AL Robertson  |
| <del>THB-52</del><br>T43   | Without-prejudice ("W/P") letter of 30 December 2003 from LD (LACO) to CCC, forwarded by LACO to HA/HD, DoJ and LD   | LD : JS Corrigan<br>HA/HD : Vincent Tong, NM Chan, Handa Lam<br>DoJ : Gregory Payne   |
| <del>THB-331</del><br>T214 | Letter of 5 January 2004 from CCC to DoJ   | DoJ : Gregory Payne, Enzo Chow  |
| <del>THB-332</del><br>T215 | Letter of 6 January 2004 from DoJ to CCC   | DoJ : +   |
| <del>THB-53</del><br>T44   | Letter of 8 January 2004 from LD (LACO) to CCC, copied to DD/G (i.e. Deputy Director (General)) of LD, forwarded to HA/HD and DoJ  | LD : JS Corrigan<br>HA/HD : Vincent Tong, NM Chan, Handa Lam<br>DoJ : Gregory Payne   |
| <del>THB-54</del><br>T45   | 1 <sup>st</sup> letter of 8 January 2004 from CCC to LD (LACO), forwarded by LD to HA/HD and DoJ   | LD : AL Robertson, JS Corrigan<br>HA/HD : Vincent Tong, NM Chan, Handa Lam<br>DoJ : Gregory Payne   |
| <del>THB-55</del><br>T46   | 2 <sup>nd</sup> letter of 8 January 2004 from CCC to LD (LACO), forwarded by LD to HA/HD and DoJ   | LD : AL Robertson, JS Corrigan<br>HA/HD : Vincent Tong, NM Chan, Handa Lam<br>DoJ : Gregory Payne   |
| <del>THB-56</del><br>T47   | W/P letter of 9 January 2004 from CCC to LD (LACO), forwarded by LD to HA/HD and DoJ   | LD : AL Robertson, JS Corrigan<br>HA/HD : Vincent Tong<br>DoJ : Gregory Payne   |

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| <del>THB 57</del><br>T48   | W/P letter of 15 January 2004 from LD (LACO) to CCC, copied to DD/G, DoJ and HA/HD | LD : JS Corrigan<br>HA/HD : Vincent Tong<br>DoJ : Gregory Payne   |
| <del>THB 361</del><br>T239 | Letter of 16 January 2004 from CCC to LD (LACO), forwarded by LD to DoJ and HA/HD  | LD : AL Robertson, JS Corrigan<br>HA/HD : Vincent Tong<br>DoJ : Gregory Payne   |
| <del>THB 362</del><br>T240 | Letter of 16 January 2004 from CCC to LD (LACO)                                    | LD : AL Robertson   |
| <del>THB 58</del><br>T49   | Letter of 17 January 2004 from LD to CCC   | LD : AK Paton, James Merritt, Susan Ku, Martin Wong, AL Robertson, Patrick Lau<br>HPLB : Joey Lam, Diane Wong, Mable Chan<br>DoJ : Simon Lee                      |
| <del>THB 59</del><br>T50   | Letter of 19 January 2004 from CCC to LD, forwarded by LD to HD                    | LD : JS Corrigan, AL Robertson, Patrick Lau<br>HA/HD : Vincent Tong, NM Chan, Handa Lam, Peggy Chan<br>HPLB : Joey Lam, Diane Wong, Mable Chan<br>DoJ : Simon Lee |
| <del>THB 60</del><br>T51   | Letter of 20 January 2004 from CCC to LD, copied to LD (LACO)                      | LD : JS Corrigan, AL Robertson, Patrick Lau<br>HPLB : Joey Lam, Diane Wong, Mable Chan<br>DoJ : Simon Lee   |
| <del>THB 363</del><br>T241 | Letter of 20 January 2004 from CCC to LD (LACO)                                    | LD : AL Robertson, JS Corrigan  |
| <del>THB 364</del><br>T242 | Letter of 21 January 2004 from LD (LACO) to CCC                                    | LD : JS Corrigan*   |
| <del>THB 365</del><br>T243 | Letter of 21 January 2004 from CCC to LD, copied to LACO                           | LD : JS Corrigan, AL Robertson  |
| <del>THB 61</del><br>T52   | Letter of 21 January 2004 from LD to CCC   | LD : AK Paton, James Merritt, Susan Ku, Martin Wong, AL Robertson, Patrick Lau<br>HPLB : Joey Lam, Diane Wong, Mable Chan<br>DoJ : Simon Lee                      |

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| <del>THB 366</del><br>T244 | Letters of 21 January 2004 from CCC to LD (LACO)   | LD : AL Robertson, JS Corrigan   |
| <del>THB 49</del><br>T40   | Letter of 26 January 2004 from CCC to LD   | LD : JS Corrigan, AL Robertson, Patrick Lau<br>HPLB : Joey Lam, Diane Wong, Mable Chan<br>DoJ : Simon Lee  |
| <del>THB 367</del><br>T245 | Fax message of 26 January 2004 from CCC to LD (LACO)                                     | LD : AL Robertson  |
| <del>THB 64</del><br>T55   | Letter of 31 January 2004 from CCC to LD (LACO), forwarded by LD to HA/HD, DoJ and HPLB  | LD : AL Robertson, JS Corrigan, Patrick Lau<br>HA/HD : Vincent Tong<br>DoJ : Gregory Payne, Simon Lee<br>HPLB : Mable Chan, Joey Lam, Diane Wong |
| <del>THB 65</del><br>T56   | Letter of 3 February 2004 from LD (LACO) to CCC, forwarded by LD to HA/HD, DoJ and HPLB  | LD : JS Corrigan, Patrick Lau<br>HA/HD : Vincent Tong<br>DoJ : Gregory Payne, Simon Lee<br>HPLB : Mable Chan, Joey Lam, Diane Wong               |
| <del>THB 66</del><br>T57   | Letter of 4 February 2004 from LD (LACO) to CCC  | LD : JS Corrigan, Patrick Lau<br>HA/HD : Vincent Tong<br>DoJ : Gregory Payne, Simon Lee<br>HPLB : Joey Lam, Diane Wong, Mable Chan               |
| <del>THB 67</del><br>T58   | Letter of 10 February 2004 from CCC to LD  | LD : JS Corrigan, AL Robertson, Patrick Lau<br>HPLB : Joey Lam, Diane Wong, Mable Chan<br>DoJ : Simon Lee  |
| <del>THB 368</del><br>T246 | Letter of 10 February 2004 from CCC to LD (LACO)   | LD : AL Robertson  |
| <del>THB 68</del><br>T59   | Letter of 11 February 2004 from CCC to LD (LACO), forwarded by LD to HA/HD, DoJ and HPLB | LD : AL Robertson, JS Corrigan, Patrick Lau<br>HA/HD : Vincent Tong<br>DoJ : Simon Lee<br>HPLB : Mable Chan, Joey Lam, Diane Wong                |

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| <del>THB 69</del><br>T60 | Letter of 12 February 2004 from LD (LACO) to CCC   | LD : JS Corrigan, Patrick Lau<br>HPLB : Joey Lam, Diane Wong, Mable Chan<br>DoJ : Simon Lee  |
| <del>THB 70</del><br>T61 | Letter of 12 February 2004 from CCC to LD (LACO), forwarded by LD to HA/HD, DoJ and HPLB | LD : AL Robertson, JS Corrigan, Patrick Lau<br>HA/HD : Vincent Tong<br>DoJ : Gregory Payne, Simon Lee<br>HPLB : Mable Chan, Joey Lam, Diane Wong |
| <del>THB 71</del><br>T62 | Letter of 12 February 2004 from LD (LACO) to CCC   | LD : JS Corrigan, Patrick Lau<br>HA/HD : Vincent Tong<br>DoJ : Gregory Payne, Simon Lee<br>HPLB : Mable Chan, Joey Lam, Diane Wong               |
| THB 369<br>T247          | Letter of 13 February 2004 from CCC to LD (LACO), forwarded by LD to HA/HD and DoJ       | LD : AL Robertson, JS Corrigan<br>HA/HD : Vincent Tong, NM Chan<br>DoJ : Gregory Payne   |
| THB 370<br>T248          | Letter of 13 February 2004 from LD (LACO) to CCC, forwarded by LD to HA/HD and DoJ       | LD : JS Corrigan<br>HA/HD : Vincent Tong, NM Chan<br>DoJ : Gregory Payne   |
| THB 371<br>T249          | Letter of 16 February 2004 from CCC to LD (LACO), forwarded by LD to HA/HD and DoJ       | LD : AL Robertson, JS Corrigan<br>HA/HD : Vincent Tong, NM Chan<br>DoJ : Gregory Payne   |
| THB 372<br>T250          | Letter of 16 February 2004 from LD (LACO) to CCC, blind carbon copy sent to LD and DoJ   | LD : Patrick LC Lau<br>DoJ : Simon Lee, Gregory Payne, Enzo Chow   |
| THB 333<br>T216          | Letter of 20 February 2004 from CCC to JSM and DoJ                                       | HA/HD : Handa Lam<br>DoJ : Gregory Payne   |
| THB 373<br>T251          | Letter of 20 February 2004 from CCC to LD (LACO)   | LD : AL Robertson, JS Corrigan*  |

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| <del>THB 374</del><br>T252 | Letter of 20 February 2004 from LD (LACO) to CCC  | LD : JS Corrigan  |
| <del>THB 375</del><br>T253 | Letter of 21 February 2004 from LD (LACO) to CCC forwarded by LD to HA/HD, DoJ and HPLB                                   | LD : JS Corrigan, Patrick Lau<br>HA/HD : Vincent Tong, CM Leung<br>HPLB : Mable Chan<br>DoJ : Gregory Payne, Simon Lee                    |
| <del>THB 376</del><br>T254 | Letter of 23 February 2004 from CCC to LD (LACO)  | LD : AL Robertson   |
| <del>THB 377</del><br>T255 | Letter of 24 February 2004 from CCC to LD (LACO)  | LD : AL Robertson   |
| <del>THB 378</del><br>T256 | Letter of 25 February 2004 from CCC to LD (LACO)  | LD : AL Robertson   |
| <del>THB 379</del><br>T257 | Letter of 25 February 2004 from LD (LACO) to CCC  | LD : AL Robertson*  |
| <del>THB 380</del><br>T258 | Letter of 25 February 2004 from CCC to LD (LACO)  | LD : AL Robertson   |
| <del>THB 72</del><br>T63   | Letter of 26 February 2004 from CCC to LD (LACO)  | LD : AL Robertson, JS Corrigan*, Patrick Lau<br>HPLB : Joey Lam, Diane Wong, Mable Chan<br>DoJ : Simon Lee                                |
| <del>THB 50</del><br>T41   | Memorial of an instrument dated 26 February 2004 issued by LD and registered in the Land Registry by Memorial No. 9149299 | LD : AL Robertson*  |
| <del>THB 381</del><br>T259 | Letter of 27 February 2004 from LD (LACO) to CCC, copied to HA/HD   | HA/HD : Vincent Tong  |
| <del>THB 382</del><br>T260 | Letter of 27 February 2004 from CCC to LD (LACO)  | LD : AL Robertson   |
| <del>THB 383</del><br>T261 | Letter of 6 March 2004 from LD (LACO) to CCC  | LD : +  |
| <del>THB 384</del><br>T262 | Letter of 8 March 2004 from CCC to LD (LACO)  | LD : AL Robertson   |
| <del>THB 385</del><br>T263 | 2 <sup>nd</sup> Letter of 8 March 2004 from CCC to LD (LACO)  | LD : AL Robertson   |

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| <del>THB 334</del><br>T217 | Letter of 19 March 2004 from DoJ to CCC  | DoJ : +   |
| <del>THB 335</del><br>T218 | Notice to Act dated 10 June 2004 filed by the current HA's solicitors, Messrs Philip KH Wong, Kennedy YH Wong & Co which was served on CCC and DoJ | DoJ : Gregory Payne   |
| <del>THB 76</del><br>T67   | Letter of 5 July 2004 from LD (LACO) to CCC, forwarded by LD to DoJ and RVD  | LD : JS Corrigan, Eliza Ma, Patrick Lau<br>DoJ : Gregory Payne, Simon Lee<br>RVD : YL Yuen, TW Pang<br>HPLB : Joey Lam, Diane Wong, Mable Chan  |
| <del>THB 79</del><br>T70   | Letter of 7 December 2004 from LD (LACO) to CCC, forwarded by LD to HA/HD  | HA/HD : HY Wu^<br>LD : JS Corrigan*, Patrick Lau<br>HPLB : Joey Lam, Diane Wong, Mable Chan<br>DoJ : Simon Lee  |
| <del>THB 386</del><br>T264 | Letter of 7 December 2004 from LD (LACO) to CCC  | LD : JS Corrigan*   |
| <del>THB 387</del><br>T265 | Letter of 8 December 2004 from CCC to LD (LACO)  | LD : AL Robertson*, JS Corrigan*  |
| <del>THB 388</del><br>T266 | Letter of 8 December 2004 from LD (LACO) to CCC  | LD : JS Corrigan*   |
| <del>THB 389</del><br>T267 | Letter of 8 December 2004 from CCC to LD (LACO), forwarded by LD to HA/HD, DoJ, LD and HPLB  | HPLB : Mable Chan, Diane Wong, Thomas Tso, Timothy Li, Wong Yuet Wah<br>HA/HD : CM Leung, Anthony Wong, Joey Lam, Raymond Sy, Vincent Tong, WP Tam<br>DoJ : Simon Lee, Enzo Chow<br>LD : Patrick Lau, JS Corrigan, AL Robertson |



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| <del>THB 390</del><br>T268 | Letter of 9 December 2004 from LD (LACO) to CCC, forwarded by LD to HA/HD, DoJ, LD and HPLB   | HPLB : Mable Chan, Diane Wong, Thomas Tso, Timothy Li, Wong Yuet Wah<br>HA/HD : Anthony Wong, CM Leung, Joey Lam, Raymond Sy, Vincent Tong, WP Tam<br>DoJ : Simon Lee, Enzo Chow<br>LD : Patrick Lau, JS Corrigall, AL Robertson |
| <del>THB 391</del><br>T269 | Letter of 9 December 2004 from LD (LACO) to CCC   | LD : +   |
| <del>THB 392</del><br>T270 | Letter of 10 December 2004 from LD (LACO) to CCC  | LD : JS Corrigall*   |
| <del>THB 393</del><br>T271 | Letter of 10 December 2004 from CCC to LD (LACO)  | LD : AL Robertson  |
| <del>THB 394</del><br>T272 | Letter of 13 December 2004 from CCC to LD (LACO), forwarded by LD to HA/HD, DoJ, LD and HPLB  | HA/HD : CM Leung, Joey Lam, Vincent Tong, WP Tam<br>HPLB : Mable Chan, Diane Wong<br>DoJ : Simon Lee<br>LD : AL Robertson, Patrick Lau, JS Corrigall   |
| <del>THB 395</del><br>T273 | Letter of 18 December 2004 from LD (LACO) to CCC<br>[Note : The CCC's letter as referred to in the opening paragraph should be dated 13 December 2004 ( <del>THB 394</del> <sup>T273</sup> ). It is understood from the then Personal Secretary of Mr. AL Robertson that a draft reply letter to CCC was prepared on 13 December 2004. When fairing the draft letter on 18 December 2004, no amendments to the words "even date" was made.] | LD : AL Robertson<br>DoJ : Simon Lee, Enzo Chow  |

**Key :**

- \* – The names of officers who should have access to the documents or records concerned according to his/her then scope of work at the material time.
- + – It cannot be found in relevant files that the letters concerned had been passed to or copied to anybody.
- ^ – According to HA/HD's record, there was no officer named HY WU at the material time. It may be intended for a Mr KY WU who was a Senior Administrative Officer working under Mr Vincent TONG.

CEO – Chief Executive's Office

DoJ – Department of Justice

HA – Hong Kong Housing Authority

HD – Housing Department

HPLB – The then Housing, Planning and Lands Bureau

LACO – The Legal Advisory and Conveyancing Office of Lands Department

LD – Lands Department

RVD – Rating and Valuation Department

**Note :**

Document numbers which are underlined are those provided in previous submission.

**Remarks**

We refer to our response to part 1(a)(i) of the Appendix to the letter from the Clerk to the Select Committee of 12.5.09 (<sup>T195</sup>~~THB-312~~) which we stated that we are seeking consent from the developer of the Hung Hom Peninsula development via its solicitors to our intended disclosure of some document as their disclosure will require the developer's consent. Follow-up letters had been sent to the developer's solicitors and we are still awaiting receiving the developer's reply. We will provide these documents to the Select Committee once the consent from the developer has been obtained.