

Page 1:

# Solicitor-Client Privileged

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Dec 12<sup>th</sup> -> / MB (Report?)

Attachment (op'n)"

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Page 2:

"MFIPPA – red hill

3 – 5 weeks – collect what we have

- prior reports?
- If public released what will it cost us

= used or required in litigat'n

= implic's for current or even past litig'n

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Dave Boghosian has 1 active claim

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liab for 'not' taking action

disc's w Gary Moore

- Plan
- Other testing
- -redo in place
- Dec 6 or 7<sup>th</sup> update item

NB -> what do we say in public + in camera"

Page 3:

"- any historical claims

- Vicarious liab. – Gary’s dec’s + steps
- ➔ Implication’s for use of roadway or speed limit
- ➔ Dec 6 (PW?)
- risks
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Golder/Tradewind”