

BETWEEN:

POLICE CONSTABLE CARDIFF ROBINSON

PLAINTIFF

AND

(1) CHIEF INSPECTOR FRANK OWEN

(2) THE COMMISSIONER OF POLICE

(c/o The Attorney-General of the Cayman Islands)



DEFENDANTS

PLAINTIFFS AMENDED LIST OF DOCUMENTS

The following is a list of the documents relating to the matters in question in this action which are or have been in the possession, custody or power of the above-named Plaintiff and which is served in compliance with Order 24, rule 2, and by Order of the Court dated 27 December 2013.

1. The Plaintiff has in his possession, custody or power the documents relating to the matters in question in this action enumerated in Schedule, Part 1, hereto.
2. Neither the Plaintiff, nor his attorney nor any other person on his behalf, has now, or ever had, in his possession, custody or power any document of any description whatever relating to any matter in question in this action, other than the documents enumerated in Schedule 1, part 1.

SCHEDULE 1

PART 1

	<u>Description</u>	<u>Date</u>
1	Email Chain	27 May 2013
2	Memorandum	27 March 2013
3	Medical Report	3 April 2013
4	Letter	3 October 2012
5	Email Chain	3 October 2012
6	Email Chain	3 October 2012
7	Email Chain	2 October 2012
8	Email Chain	2 October 2012
9	Email Chain	2 October 2012
10	Memorandum	1 October 2012
11	Email Chain	27 Sept 2012
12	Letter of Reference	9 September 2012
13	Application for Judicial review	5 September 2012
14	Affidavit of PC Cardiff Robinson	5 September 2012
15	Letter to Superintendent Kurt Walton	16 August 2012
16	Letter from DPP	14 August 2012
17	Letter to DPP	8 August 2012
18	Email Chain	12 April 2012
19	Email Chain	7 August 2012
20	Email Chain	7 August 2012
21	Email	6 August 2012
22	Weekly Activity Sheet	4 March 2012
23	Email	27 March 2012
24	Email	27 March 2012
25	Email	27 March 2012
26	Email Chain	27 March 2012
27	Email	27 March 2012
28	Email Chain	27 March 2012
29	Email Chain	27 March 2012
30	Email Chain	26 March 2012
31	Email Chain	16 March 2012
32	Email	15 March 2012
33	Email	6 March 2012
34	Email Chain	6 March 2012
35	Email	5 March 2012
36	Incident Report	15 February 2012
37	Incident Report Form	15 February 2012
38	Email Chain	13 February 2012
39	Email	2 February 2012
40	Email	24 January 2012
41	I news Community Article	18 January 2012

81	Statement of PC Robinson re Frank Owens 2	19 February 2012
82	Statement of PC Robinson re Frank Owens 3	21 February 2012
83	Statement of PC Robinson Re Frank Owens	15 February 2012
84	Statement re First Assault (PC Robinson)	19 February 2012
85	Statement of Chief Inspector Beersingh	
86	Statement of Chief Inspector Beersingh	
87	Statement of PC Robinson (Owens 4)	
88	Statement of PC Robinson (Traffic Accident) 2	
89	Statement of PC Robinson (Traffic Accident) 3	
90	Warning Letter	20 March 2012
	File Folder Mail	
91	Unnamed Can't open	
92	Assault Definition	Undated
93	File CR looks like duplicate	
94	File CR2 looks like duplicate	
95	Doc 1 Chrome Can't open	
96	Doc 2 Can't open	
97	Doc 3 Can't open	
98	Doc 4 Can't open	
99	Doc 5 Can't open	
100	Doc 6 Can't open	
101	Doc 7 Can't open	
102	Doc 8 Can't open	
103	Doc 9 Can't open	
104	Doc 10 Can't open	
105	Doc 11 Can't open	
106	Doc 12 Can't open	
107	Doc 13 Can't open	
108	Document (AutoSaved) 37 Can't open	
109	Document (AutoSaved) Can't open	
110	Further Statement Can't open	
111	FW Chief Inspector Frank Owens Behaviour Email (open) and Memo (Can't open)	
112	FW Email Chain	21 March 2012
113	FW Apology Email	5 October 2012
114	FW Assistance email chain (Memorandum and appendix Can't open)	1 October 2012
115	FW Email (Audio recording) interview with PC Robinson	29 October 2012
116	Ditto	6 November 2012
117	Ditto	16 November 2012
118	FW Disciplinary Proceedings : re PC Emanuel Brown	12 October 2011
119	FW Driver Training (19) Email Chain	19 March 2012
120	FW Driver Training Email Chain	26 March 2012
121	FW Electronic Ticket receipt March 17 Email Chain (Image	14 March 2012

	Can't Open)	
122	FW Enquiry Notification Email	27 September 2012
123	FW Driver Training Email Chain	19 March 2012
124	FW Email Chain Grounds of Appeal (Attachments Can't Open).	27 October 2011
125	FW Proactive Overtime Duties Email Chain	14 March 2012
126	FW Incident at Webster's Estates (14) Email Chain	27 March 2012
127	FW Incident at Webster's Estates (15) Email Chain	27 March 2012
128	FW Incident at Webster's Estates (16)	27 March 2012
129	FW Incident at Webster Estates Email Chain	27 March 2012
130	FW Email Intel on Anthony Morrison Email Chain	16 March 2012
131	FW Legal Representation PC Cardiff Robinson	8 May 2012
132	FW Meeting with PC Robinson Email Chain	15 October 2012
133	FW Meeting with PC Robinson Email Chain	19 October 2012
134	FW PC Brown Email	1 August 2011
135	Email Chain (Attachments can't open).PC Robinson Welfare Administration	3 October 2012
136	Email Chain (Attachments can't open).PC Robinson Welfare Administration	Ditto
137	Email Chain (Attachments can't open).PC Robinson Welfare Administration	Ditto
138	Email Chain (Attachments can't open).PC Robinson Welfare Administration	Ditto
139	Email Chain (Attachments can't open).PC Robinson Welfare Administration	Ditto
140	Email Chain (Attachments can't open).PC Robinson Welfare Administration	Ditto
141	Email Chain (Attachments can't open).PC Robinson Welfare Administration	Ditto
142	Email Chain (Attachments can't open).PC Robinson Welfare Administration	Ditto
143	Email Chain (Attachments can't open).PC Robinson Welfare Administration	Ditto
144	Email Chain (Attachments can't open).PC Robinson Welfare Administration	Ditto
145	FW Re Appendices (email) Attachments Can't open	2 October 2012
146	FW Case Ruling Chief Inspector Owens Email Chain	6 August 2012
147	FW Re Meetings with Inspector McLaughlin (3) Email Chain	22 August 2012
148	FW Re Meetings with Inspector McLaughlin (5) Email Chain	10 October 2012
149	FW Re Meetings with Inspector McLaughlin (6) Email Chain	4 October 2012
150	FW Re Meetings with Inspector McLaughlin Email Chain	Ditto
151	FW Re Meetings with Inspector McLaughlin Email Chain	Ditto
152	FW Re Meetings with Inspector McLaughlin Email Chain	Ditto
153	FW Re Meetings with Inspector McLaughlin Email Chain	Ditto
154	FW Re Meetings with Inspector McLaughlin Email Chain	Ditto
155	FW Re Meetings with Inspector McLaughlin Email Chain	Ditto
156	FW Re Meetings with Inspector McLaughlin Email Chain	Ditto

157	FW Re PC Robinson (Police Association) Email Chain	16 March 2012
158	FW Reservation Request (14) Email Chain (Image Can't Open).	15 March 2012
159	FW Reservation Request (22) (Image Can't Open)	Ditto
160	FW Reservation Request (Attachment Can't Open)	Ditto
161	FW Scan from Xerox WorkCentre (20) Email (Attachment Can't Open)	18 March 2012
162	FW Scan from Xerox WorkCentre Email (Attachment Can't Open)	25 September 2012
163	Unlawful detention (Email Chain)	28 March 2012
164	FW Email	22 August 2012
165	FW Re Senior Constable (Can't Open)	7 September 2012
166	Legal representation PC Robinson memo (Can't Open)	8 May 2012
167	Meeting with CI Frank Owens Email	16 March 2012
168	Meeting with PC Robinson Email	15 October 2012
169	Meeting with PC Robinson Email	19 October 2012
170	PC Robinson Welfare Administration Email (Attachments Can't Open)	3 October 2012
171	Police Association Membership Email (Attachment Can't Open)	20 March 2012
172	Police Memo 12 to Frank Owens Email (Attachment Can't Open)	7 September 2012
173	Police Memo re Chief Inspector Frank Owens Email (Attachment Can't Open)	7 September 2012
174	Police memo to Frank Owens re Absence Email (Attachment Can't Open)	7 September 2012
175	Police Memo Email (Attachment Can't Open)	7 September 2012
176	Re (Emails)	21 March 2012
177	Re Assault Definitions 7 Emails	15 August 2012
178	Re Assault Definitions 8 Emails	Ditto
179	Re Assault Definitions Emails	Ditto
180	Re Assistance Email Chain	1 October 2012
181	Re Driver Training Email Chain	19 March 2012
182	Re Enquiry Notification (1) (Email Chain)	27 September 2012
183	Re Enquiry Notification (2) (Email Chain)	Ditto
184	Re Enquiry Notification (3) (Email Chain)	Ditto
185	Re Enquiry Notification (Email Chain)	Ditto
186	Re Driver Training (Email Chain)	19 March 2012
187	Re Incident at Webster's Estate (Email Chain)	27 March 2012
188	Re Legal representation PC Cardiff Robinson (Email Chain) Can't Open Images	8 May 2012
189	Re Legal representation PC Cardiff Robinson (Email Chain) Can't Open Images	8 May 2012
190	Re Legal representation PC Cardiff Robinson (Email Chain) Can't Open Images	8 May 2012
191	Re Legal representation PC Cardiff Robinson (Email Chain) Can't Open Images	8 May 2012

192	Re meeting with PC Robinson (Email) (2)	15 October 2012
193	Re meeting with PC Robinson (Email Chain) (7)	15 October 2012
194	Re meeting with PC Robinson (Email Chain) (8)	15 October 2012
195	Re meeting with PC Robinson (Email Chain) (9)	15 October 2012
196	Re meeting with PC Robinson (Email Chain)	15 October 2012
197	Re meeting with PC Robinson (Email Chain) (1)	19 October 2012
198	Re meeting with PC Robinson (Email Chain) (3)	19 October 2012
199	Re meeting with PC Robinson (Email Chain) (4)	19 October 2012
200	Re meeting with PC Robinson (Email Chain) (5)	19 October 2012
201	Re meeting with PC Robinson (Email Chain) (6)	19 October 2012
202	Re meeting with PC Robinson (Email Chain)	19 October 2012
203	Re PC Robinson Welfare Administration (Email Chain) can't open Image	3 October 2012
204	Re PC Robinson Welfare Administration (Email Chain) can't open Image	Ditto
205	Re PC Robinson Welfare Administration (Email Chain) can't open Image	Ditto
206	Re PC Robinson Welfare Administration (Email Chain) can't open Image	Ditto
207	Re PC Robinson Welfare Administration (Email Chain) can't open Image	Ditto
208	Re PC Robinson Welfare Administration (Email Chain) can't open Image	Ditto
209	Re PC Robinson Welfare Administration (Email Chain) can't open Image	Ditto
210	Re PC Robinson Welfare Administration (Email Chain) can't open Image	Ditto
211	Re PC Robinson Welfare Administration (Email Chain) can't open Image	Ditto
212	Re Personal 112 482 (35) (Email Chain)	27 September 2012
213	Re personal 112 482 (Email Chain)	Ditto
214	Re leave Application Letter from Counsellor	3 October 2012
215	Re meeting with Inspector McLaughlin (Email Chain)	22 August 2012
216	Re meeting with Inspector McLaughlin (Email)	23 August 2012
217	Re meeting with Inspector McLaughlin (Email Chain)	22 August 2012
218	Re meeting with Inspector McLaughlin (Email Chain)	4 October 2012
219	Re meeting with Inspector McLaughlin (Email Chain)	Ditto
220	Re meeting with Inspector McLaughlin (Email Chain)	Ditto
221	Re meeting with Inspector McLaughlin (Email Chain)	Ditto
222	Re meeting with Inspector McLaughlin (Email Chain)	Ditto
223	Re meeting with Inspector McLaughlin (Email Chain)	Ditto
224	Re meeting with Inspector McLaughlin (Email Chain)	Ditto
225	Re meeting with Inspector McLaughlin (Email Chain)	Ditto
226	Re meeting with Inspector McLaughlin (Email Chain)	Ditto
227	Re meeting with Inspector McLaughlin (Email Chain)	Ditto
228	Re meeting with Inspector McLaughlin (Email Chain)	Ditto
229	Re meeting with Inspector McLaughlin (Email Chain)	Ditto

230	Re meeting with Inspector McLaughlin (Email Chain)	Ditto
231	Re meeting with Inspector McLaughlin (Email Chain)	Ditto
232	Re meeting with Inspector McLaughlin (Email Chain)	Ditto
233	Re meeting with Inspector McLaughlin (Email Chain)	Ditto
234	Re PC Robinson – Police Association (Email Chain)	16 March 2012
235	Re PC Robinson – Police Association (Email Chain)	Ditto
236	Re PC Robinson – Police Association (Email Chain)	Ditto
237	Re PC Robinson – Police Association (Email Chain)	Ditto
238	Re Unlawful Detention (4) Email Chain	28 March 2012
239	Re Unlawful Detention (12)	Ditto
240	Re Unlawful Detention (13)	Ditto
241	Re Unlawful Detention	Ditto
242	RE (Email Chain)	15 June 2012
243	Re Appendices Docs (Email) Can't Open attachment	2 October 2012
244	Re Leave Application : Letter from Counsellor (Email)	3 October 2012
245	Re Meeting with Inspector McLaughlin (Email)	23 August 2012
246	Re Meetings with Inspector McLaughlin (Email)	4 October 2012
247	Scan from Xerox Work Centre (4) Email Can't Open Scan	9 October 2012
248	Scan from Xerox Work Centre (8) Email Can't Open Scan	25 Sept 2012
249	Scan from Xerox Work Centre (11) Email Can't Open Scan	24 March 2012
250	Scan from Xerox Work Centre (13) Email Can't Open Scan	18 March 2012
251	Scan from Xerox Work Centre (17) Email Can't Open Scan	24 March 2012
252	Scan from Xerox Work Centre (21) Email Can't Open Scan	18 March 2012
253	Scan from Xerox Work Centre (27) Email Can't Open Scan	9 October 2012
254	Scan from Xerox Work Centre Email Can't Open Scan	9 October 2012
255	Untitled 9 Email	15 June 2012
256	Untitled	19 Sept 2012
257	WL Email (Can't Open Message)	24 March 2012
	RECORDINGS ON DISC	
258	Interview by PSU	17 October 2012
259	Ditto	Ditto
260	Ditto	23 October 2012
261	Ditto	Ditto
262	Ditto	Ditto
263	Misconduct Investigation Procedures	Undated
	Statement of Chief Inspector Beersingh	20 February 2014
	Statement of PC Richard Harford	30 August 2013
	Statement of PC Roje Williams	3 June 2013
	Statement of PC Michael Peart	16 April 2013
	Statement of Donald Emilo McLaughlin (Businessman)	19 April 2013
	Statement of Tameka Walker (Special Constable)	March 2012
	Statement of PC Cardiff Robinson	

	Statement of PC Cardiff Robinson	19 February 2012
	Statement of PS Winsome Prendergast	20 February 2012
	Statement of PC Cardiff Robinson	21 February 2012
	Statement of Chief Inspector Patrick Beersingh	19 September 2012
	statement of Nadine Mason (Sales Clerk)	17 September 2013

Part 2

There are no Documents in the possession of the Plaintiffs which the Plaintiffs object to producing other than documents which are attributed to attorney client privilege.

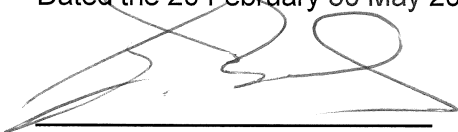
Part 3

Not Applicable

SCHEDULE 2

Not Applicable

Dated the ~~20 February~~ 30 May 2014



Irvin Banks

Attorney-at-Law for the Plaintiff

NOTICE TO INSPECT

TAKE NOTICE that the documents in the above list, may be inspected at the office of the attorney of the above-named Plaintiff by appointment.

TO: Crown Counsel: Office of the Attorney-General

This List of Documents was served by Irvin Banks, Attorney-at-Law for the Plaintiffs
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