

**COMMISSION OF INQUIRY  
INTO THE DIAPHRAGM WALL AND PLATFORM SLAB  
CONSTRUCTION WORKS  
AT THE HUNG HOM STATION EXTENSION  
UNDER THE SHATIN TO CENTRAL LINK PROJECT  
("THE COMMISSION")**

**OPENING ADDRESS BY COUNSEL FOR THE COMMISSION  
(for Substantive Hearing commencing on 22 October 2018)**

[References below to, for example, **B1/1** are references to the bundle number and page number of the documents prepared for the Substantive Hearing]

**A. The Commission**

1. On 10 July 2018, the Commission was appointed by the Chief Executive in Council of the Hong Kong SAR under section 2 of the Commissions of Inquiry Ordinance (Cap. 86). The Terms of Reference ("**ToR**") of the Commission will be found at **A1/1**. The Chairman and Commissioner is Mr. Michael Hartmann, with Professor Peter Hansford as Commissioner.

**B. Background**

2. Since May 2018, reports began to appear in the local media [**A1/32-61**] which suggested that steel fixing works in the diaphragm walls and platform slabs at the Hung Hom Station Extension, constructed as part of

- the Shatin to Central Link project (“**the SCL Project**”) under MTR Corporation Limited Contract 1112, might be defective.
3. Contract 1112 involves the expansion of the existing Hung Hom Station and comprises, amongst other things, two additional platform (track) slabs for the East West Corridor (Tai Wai to Hung Hom) (“**EWL**”) and North South Corridor (Hung Hom to Admiralty) (“**NSL**”).
  4. There were allegations made that an unknown number of steel bars (which were designed to be connected by couplers) embedded in the concrete of the completed diaphragm walls and EWL Slab were either deliberately shortened (or cut) or never properly connected to the couplers before concrete pouring.
  5. As a result of the allegations made, public concern has arisen over the quality of works and safety of the Hung Hom expanded station, which is still under construction, albeit at a very advanced stage.
  6. On 31 May 2018, the Highways Department (“**HyD**”) requested MTR Corporation Limited (“**MTRCL**”), as project manager of the SCL Project, to prepare and submit a report on the alleged non-compliant steel fixing works at the “*joints between diaphragm walls and the platform slabs at Hung Hom Station under Contract 1112*” [**G3/1777**].
  7. On 15 June 2018, MTRCL published and submitted its report to the Railway Development Office (“**RDO**”) of HyD (“**the MTRCL Report**”) [**B1/1-46**]. The MTRCL Report was limited to a review of the “EWL Slab”. In the MTRCL Report it is apparent that the terms “*EWL platform slab*”, “*EWL platform slab works*”, “*EWL slab*” and “*EWL track slab*” are used interchangeably. It has subsequently emerged that there are

inaccuracies in the MTRCL Report which are likely to be relevant to the Commission.

8. On 21 June 2018 [**B9/7031**], MTRCL announced that the Capital Works Committee under the MTRCL Board of Directors would conduct a review of the processes and procedures for the SCL Project, and engage external consultants (Turner & Townsend) to assist in the review.
9. On 22 June 2018 [**H8/3020** and **B8/5397**], MTRCL submitted a preliminary load test proposal prepared by an independent expert (CM Wong & Associates Ltd) (“**CMWA**”) to HyD and the Buildings Department (“**BD**”).
10. On 10 July 2018, the Commission was appointed by the Chief Executive in Council of the Hong Kong SAR as stated above.
11. On 13 July 2018 [**G2/1742**], MTRCL submitted to HyD/RDO further information concerning the design and construction of the EWL slab. It was indicated that the “*east side of the slab is also connected directly to the diaphragm wall using a combination of structural connection details*” and that, therefore, (inferentially at least) there were inaccuracies in the MTRCL Report.
12. On 20 July 2018 [**H8/3376**] MTRCL sent HyD/RDO and BD CMWA’s revised load test proposal which was confined to Area C1-1 and 1875, with a changed methodology.
13. On 15 August 2018, the Transport and Housing Bureau (“**THB**”) appointed an “Expert Adviser Team” (“**the EAT**”) for the SCL Project. Its Terms of Reference and membership (apparently three former, now

retired, senior Government officials) are at **G3/1850**. It is self-evident that, whilst primarily focused on the roles of MTRCL and the Government itself, the remit of the EAT overlaps considerably with the Commission. (Whilst certain documents disclosed to the Commission shed some light on the EAT's evidential gathering process (see, for example, the email dated 3 October 2018 at **G13/10608-10609**) and recent press reports suggest that the EAT supports the idea of opening up sections of the EWL slab, it is not yet clear to the Commission as to how far the EAT has reached in fulfilling its tasks and/or on what evidential basis it might make any recommendations as to opening up, or otherwise. It is understood that the EAT may publish an interim report within this month [**G13/10591**].)

14. On 30 August 2018 [**H8/3390**], MTRCL submitted CMWA's further revised load test proposal and methodology to HyD and BD. Based on the "*latest information*", CMWA concluded that there are 11 types of as-built connection at the top of the East D-Wall in Areas B and C, as shown on the drawing at **H9/3818**. None of the proposed load tests referred to above have been implemented, the intention of the Government and MTRCL in this regard is currently unclear and the views of the EAT in respect of load testing are currently unknown.

15. The Commission may wish to question and hear from a representative of CMWA and one or more members of the EAT in due course. Appropriate notice will be given.

### **C. The ToR**

16. Since the Preliminary Hearing on 24 September 2018, the Commission has taken steps to ascertain details pertaining to reports of water seepage issues in the North Approach Tunnel (“**the NAT**”) with a view to determining whether and, if so, to what extent, such issues might fall within the ToR. The Commission has received representations from the Government, MTRCL and Leighton and acknowledges their respective co-operation and input in this regard. The Commission is satisfied that, on the basis of all information received, the alleged water seepage issues at the NAT do not fall within the ambit of the Commission’s ToR and this will not, therefore, be the subject-matter of evidence at the hearing. The Commission notes, without comment, that according to the Government and MTRCL remedial works to address water seepage at the NAT was completed on 18 July 2018 and no further problems have been subsequently observed.

**D. The involved parties**

17. Since the Preliminary Hearing, the number of involved parties has increased by two. To date, the Commission has issued (a) letters requesting documentation and witness statements and (b) “Salmon letters” (that is letters giving advance notice to entities who might be the subject of criticism) to the parties identified below (“**the involved parties**”). Those parties have been asked to consider participating in, and having separate legal representation at, the Substantive Hearing. The Commission’s understanding of each involved parties’ role in the SCL Project is very briefly described.

18. There are four Government departments or bureaux involved namely the (1) THB, (2) HyD including the RDO, (3) Development Bureau (“**DevB**”) and (4) BD. The first two entities performed a monitoring role in the SCL Project and the latter two carried out their statutory duties and functions. The four entities are represented by the Department of Justice (“**DoJ**”).
19. By an agreement dated 20 August 2012 [**G9/7638**], PYPUN-KD & Associates Limited (“**Pypun**”) was engaged by RDO on behalf of the Government as a Monitoring & Verification Consultant to, inter alia, monitor the performance of MTRCL under the Entrustment Agreement referred to below.
20. MTRCL was appointed by THB on behalf of the Government under an Entrustment Agreement dated 24 November 2008 [**G7/5466**] to design and carry out site investigation works for the SCL Project, by a further Entrustment Agreement dated 17 May 2011 [**G7/5521**] to carry out certain advance works as defined therein and by a further Entrustment Agreement dated 29 May 2012 (“**the Entrustment Agreement**”) [**G7/5595**] to project manage the construction and commissioning of the SCL Project. The Government is the majority shareholder of MTRCL.
21. Pursuant to a Consultancy Agreement dated on or about 14 January 2010 [**B10/7652**], Atkins China Limited (“**Atkins**”) was engaged by MTRCL to be MTRCL’s design consultant for the SCL Project and by a further and separate contract, it is understood, Atkins was engaged by Leighton as its temporary works design consultant. The terms of this latter contract have not yet been made available to the Commission.

22. Leighton Contractors (Asia) Limited (“**Leighton**”) was the main contractor engaged by MTRCL to construct, amongst many other things, the relevant diaphragm wall and EWL/NSL slab works under Contract 1112 dated 7 March 2013 [**C1/437 to C5/4353**]. Contract 1112 was a target cost contract.
23. Pursuant to a sub-contract dated 6 September 2013 [**C6/4665**], Intrafor Hong Kong Limited (“**Intrafor**”) was Leighton’s sub-contractor responsible for, amongst other things, the diaphragm wall construction works, including re-bar preparation, bending and coupler installation. In fact, Intrafor sub-sub-contracted the fabrication and fixing of the steel reinforcement cages for the D-Walls to Hung Choi Engineering Company Limited (“**Hung Choi**”). Although not an involved party, the Commission has sought and obtained witness statements from two of Hung Choi’s personnel [**I1/19 & 21 and I1/100 & 104, I1/111 & 117, I1/124-132**].
24. Pursuant to a sub-contract dated 28 August 2015 [**E1/30**], Fang Sheung Construction Company (“**Fang Sheung**”) was Leighton’s sub-contractor responsible for carrying out the reinforcement bar cutting, bending and fixing works for the EWL/NSL slabs and associated structures, as well as the South Approach Tunnel.
25. Pursuant to a sub-contract dated 8 May 2015 [**C6/4354 and D1/65**], China Technology Corporation Limited (“**China Technology**”) was engaged by Leighton to be its sub-contractor responsible for erecting formwork, including blinding concrete, soffit formwork and slab and side construction joint formwork, installation of electrical and cast-in items,

carrying out cleaning prior to pouring concrete and pouring the concrete to form, amongst other things, the EWL slab and the NSL slab.

**E. Rules of Procedure and Practice and Opening Addresses**

26. Since the Rules of Procedure and Practice were made at the Preliminary Hearing, the Commission has varied paragraph 17(4) thereof. On the basis that a witness adopts his or her witness statement(s) as his or her evidence, it will not now be necessary for the contents of his or her witness statement(s) to be read out either by the witness or Counsel. Witness statements adduced as evidence at the hearing will be uploaded (without exhibits) to the Commission's web site. The involved parties were advised of this revision by paragraphs 7 and 8 of the Secretariat's letter respectively dated 11 October 2018 and 15 October 2018 [**A1/251-256** and **A1/257-270**]. Other details of the arrangements for the Substantive Hearing are set out in the same letters.

27. Pursuant to paragraph 14 of the Rules of Procedure and Practice, Intrafor, China Technology, Fang Sheung, Leighton, MTRCL and the Government have provided written opening addresses (which have all been put in a dedicated bundle "OS") and made applications to make oral opening addresses, which applications the Commission has granted on the basis that (a) the sequence of such oral addresses will be Intrafor, China Technology, Fang Sheung, Leighton, MTRCL and the Government and (b) each party will have the time that each has requested. On this basis it is anticipated that oral opening addresses will finish sometime in the morning of Tuesday, 23 October 2018, after which time the hearing of the evidence will commence.



## **F. Documentation**

28. Since the Preliminary Hearing the number of hearing bundles has continued to grow. There is a 'Consolidated Index of Documents' which has been and will continue to be updated on a regular basis. A summary of the current position is as follows:

Bundle(s) A: the Commission [A1]

Bundle(s) B: MTRCL [B1 –B17]

Bundle(s) C: Leighton [C1-C32]

Bundle(s) D: China Technology [D1-D2]

Bundle(s) E: Fang Sheung [E1-E6]

Bundle(s) F: Intrafor [F1-F35]

Bundle(s) G: THB and HyD & RDO [G1-G13]

Bundle(s) H: DevB and BD [H1-H20]

Bundle(s) I: Hung Choi [I1]

Bundle(s) J: Atkins [J1]

Bundle(s) K: Pypun [K1]

## **G. Witnesses**

29. A separate Index of 'Witness Statements (WS) and Police Statements (PS) (without exhibits)' and 'Responsive Witness Statements' with bundle cross-references to all statements has been prepared and is attached hereto at **Annex 1**. Further statements are expected from Atkins and Pypun.

30. As stated at the Preliminary Hearing, it is still the Commission's intention to call the factual evidence of the involved parties in the order

set out below namely:

- (1) Intrafor
- (2) China Technology
- (3) Fang Sheung
- (4) Leighton
- (5) MTRCL
- (6) Government (THB, HyD/RDO, DevB &BD).

Representatives from Hung Choi will also give oral evidence after Intrafor. With regard to Atkins and Pypun, it is anticipated that their witnesses will be called after MTRCL's witnesses, but a concluded view cannot be expressed until their witness statements have been served and reviewed. Likewise, if a representative of CMWA and/or a member of the EAT are called, they would probably come after MTRCL and before the Government witnesses.

31. A provisional timetable for the first two weeks of the hearing has been published (on 18 October 2018), and this will be updated from time to time as the hearing progresses.

#### **H. Primary topics of inquiry**

32. As matters have unfolded, and taking matters chronologically, it appears that the primary focus of the factual evidence will centre on the questions set out below. As emphasised at the Preliminary Hearing, however, the inquisitorial process is entirely flexible and the questions should not be regarded as some form of straight jacket for the evidence.

33. To hopefully assist the Commission and all involved parties, the

Commission's legal team has prepared a drawing (in A01 size) which shows a general layout of the site and which has marked on it the gridlines, the Areas into which the site was divided, the location of each of the diaphragm wall panels and, on a Bay-by Bay basis for each Area, the date of the RISC requesting checking of the rebar and the pouring of concrete date. This will be found at **A1/250** and **Annex 2** hereto.

34. With regard to the D-Walls and, in particular, the reinforcement steel in the East D-Wall, the primary questions appear to be:

- (i) What works were required by the original design/specification?
- (ii) What works were in fact installed **by Intrafor**, and how did they differ, if at all, from the original design/specification?
- (iii) If the as-built works differ from the original design/specification, what was/were the reason(s) for the changes made?
- (iv) Are there satisfactory drawings showing the as-built (**by Intrafor**) situation? If not, why not?
- (v) Insofar as the as-built (**by Intrafor**) situation differs from the original design/specification, what reporting to the Government ought to have taken place, if any, when and by whom?
- (vi) What reporting to Government, if any, in fact took place and when, and, if no such reporting took place, why not?

35. In respect of the reinforcement steel for the EWL slab and the NSL slab:

- (i) Were any of the threads to the steel bars cut?
- (ii) If so, by whom, when, in which Areas, in what number and why were they so cut?
- (iii) Were any of the threaded steel bars not connected, alternatively not

properly connected, to the couplers?

- (iv) If so, by whom, when, in which Areas, in what number and why were they not so connected or properly connected?

36. In relation to the connection between the East D-Wall and the EWL slab and, in particular, the reinforcement steel arrangement in respect thereof, separately in relation to Area A, Area HKC, Area B, Area C1, Area C2 and Area C3:

- (i) What works were required by the original design/specification?
- (ii) What works were in fact installed and how did they differ, if at all, from the original design/specification?
- (iii) If the as-built works differ from the original design/specification, what was/were the reason(s) for the changes made?
- (iv) Are there satisfactory drawings showing the as-built situation? If not, why not?
- (v) Insofar as the as-built situation differs from the original design/specification, what reporting to the Government ought to have taken place, if any, when and by whom?
- (vi) What reporting to Government, if any, in fact took place and when, and, if no such reporting took place, why not?
- (vii) Without derogating from the above, whether the whole process of connecting the East D-Wall and the EWL Slab complied with the Instrumentation of Exemption (“IoE”) and/or BD’s statutory requirements?

37. So far as engineering expert evidence is concerned, this is likely to focus on whether the as-built situation at the EWL slab, and the connection

with the East D-Wall in particular, presents any structural safety or integrity concerns and, if so, the reasons for such concerns, the appropriate steps that may be taken by way of investigation of such concerns and, if necessary, remedial proposals to address those concerns.

38. With regard to project management, to the extent (if at all) that the factual inquiry identifies any actual or potential failures, inadequacies or deficiencies in the supervision, monitoring, control and management of the SCL Project, the expert evidence will focus on how the systems in place in respect of supervision, monitoring, control and management may be strengthened and enhanced to avoid future repetition of such problems.

#### **I. Other matters**

39. In the requests for information sent to a number of the involved parties, they were asked to confirm whether, apart from the steel reinforcement issues, they had any knowledge of any other works forming part of Contract 1112 which raised concerns about public safety. A few matters have been raised in response to the Commission's request namely:

- (i) Honeycombing of concrete.
- (ii) Water seepage.
- (iii) Placement of lightweight concrete.

There is some evidence currently before the Commission in respect of these matters (but not a great deal) and, so far as item (i) above is concerned, this appears to be very much still in the course of

investigation. It may be that the engineering expert for the Commission will be requested to consider whether any of these matters justifiably raise concerns about public safety.

22 October 2018

Ian Pennicott SC

Calvin Cheuk

Solomon Lam

Counsel for the Commission

**ANNEX 1 to Opening Address by Counsel for the Commission**

**WS. Bundle of Witness statements and police statements (PS) (without exhibits)**

**Bundle WS 1 \* Annotated**

No.	Document	Date	Page(s)	RWS filed	Oral Evidence
	<b>Intrafor (Bundle F)</b>				
1.	*WS of <b>Jean-Christophe, Jacques-Oliver Gillard</b>	15.08.2018	F1/32-102	✓	<b>E</b>
1.1	*WS 2 of Jean-Christophe, Jacques-Oliver Gillard	09.10.2018	F34/19761-19772		
	<b>Hung Choi (Bundle I)</b>				
2.	*WS of <b>Chui Tim Choi</b>	21.09.2018	I/19-20		<b>C</b>
3.	*WS of Chui Tim Choi (English Translation)	21.09.2018	I/21-22		
4.	*WS 1 of <b>Wong Yiu Mo</b>	21.09.2018	I/100-103		<b>C</b>
5.	*WS 1 of Wong Yiu Mo (English Translation)	21.09.2018	I/104-107		
6.	*WS 2 of Wong Yiu Mo	03.10.2018	I/111-116		
7.	*WS 2 of Wong Yiu Mo (English Translation)	03.10.2018	I/117-122		
7.1	*WS 3 of Wong Yiu Mo	16.10.2018	I/124-126		
7.1A	*WS 3 of Wong Yiu Mo (English Translation)	16.10.2018	I/133-135		
	<b>China Technology (Bundle D)</b>				
8.	*WS 1 of <b>Poon Chuk Hung Jason</b> ("Jason Poon")	03.09.2018	D1/10-41	✓	<b>C</b>
9.	^WS 2 of Jason Poon	14.09.2018	D1/889-890		
10.	*PS 1 of Jason Poon	04.07.2018	D1/755-759		
10.1	*PS 1 of Jason Poon (English translation)	04.07.2018	D1/759.1-759.4		
11.	*PS 2 of Jason Poon	10.07.2018	D1/760-765		
11.1	*PS 2 of Jason Poon (English translation)	10.07.2018	D1/765.1-765.8		
12.	*PS 3 of Jason Poon	17.07.2018	D1/819-821		
12.1	*PS 3 of Jason Poon (English translation)	17.07.2018	D1/821.1-821.3		
13.	*PS 4 of Jason Poon	24.07.2018	D1/822-824		
13.1	*PS 4 of Jason Poon (English translation)	24.07.2018	D1/824.1-824.4		
14.	*PS 5 of Jason Poon	31.07.2018	D1/829-831		
14.1	*PS 5 of Jason Poon (English translation)	31.07.2018	D1/831.1-831.4		
15.	*PS 6 of Jason Poon	09.08.2018	D1/873-875		
15.1	*PS 6 of Jason Poon (English translation)	09.08.2018	D1/875.1-875.4		
16.	*WS 1 of <b>But Ho-Yin Ian</b>	19.09.2018	D2/909-916	✓	<b>C</b>
17.	*WS 2 of But Ho-Yin Ian	28.09.2018	D2/945-946		
18.	^PS of But Ho-Yin Ian	12.07.2018	D2/917-921		
18.1	PS of But Ho-Yin Ian (English translation)	12.07.2018	D2/921.1-921.6		
19.	*WS of <b>Ngai Lai Chi, Thomas</b> ("Thomas Ngai")	27.09.2018	D2/960-963		<b>C</b>

No.	Document	Date	Page(s)	RWS filed	Oral Evidenc e
20.	<sup>^</sup> PS 1 of Thomas Ngai	24.07.2018	D2/937-939 D2/964-966		
20.1	PS 1 of Thomas Ngai (English translation)	24.07.2018	D2/939.1-939.4		
21.	<sup>*</sup> PS 2 of Thomas Ngai	27.07.2018	D2/940-942 D2/967-969		
21.1	<sup>*</sup> PS 2 of Thomas Ngai (English translation)	27.07.2018	D2/942.1-942.4		
22.	<sup>*</sup> WS 1 of <b>Li Run-Chao</b>	19.09.2018	D2/922-927		<b>C</b>
23.	<sup>*</sup> WS 2 of Li Run-Chao	28.09.2018	D2/951-952		
24.	<sup>^</sup> PS of Li-Run-Chao	07.08.2018	D1/750-754 D2/928-932		
24.1	PS of Li Run-Chao (English translation)	07.08.2018	D1/754.1-754.6		
25.	<sup>*</sup> WS of <b>Chu Ka-Kam</b>	27.09.2018	D2/970-977		<b>C</b>
26.	<sup>*</sup> PS 1 of Chu Ka-Kam	30.07.2018	D2/901-902 D2/978-979		
26.1	<sup>*</sup> PS 1 of Chu Ka-Kam (English translation)	30.07.2018	D2/902.1-902.3		
27.	<sup>^</sup> PS 2 of Chu Ka-Kam	13.07.2018	D2/903-907 D2/980-984		
27.1	PS 2 of Chu Ka-Kam (English translation)	13.07.2018	D2/907.1-907.5		
28.	<sup>^</sup> PS 1 of <b>Ngai Chun Kit</b>	27.07.2018	D1/745-747		<b>C</b>
28.1	PS 1 of Ngai Chun Kit (English translation)	27.07.2018	D1/747.1-747.4		
29.	<sup>^</sup> PS 2 of Ngai Chun Kit	27.07.2018	D1/748-749		
29.1	PS 2 of Ngai Chun Kit (English translation)	27.07.2018	D1/749.1-749.3		
	<b>Fang Sheung</b> (Bundle E)				
30.	<sup>*</sup> WS of <b>Pun Wai Shan</b>	27.08.2018	E1/26-29		<b>C</b>
31.	<sup>*</sup> WS of Pun Wai Shan (English Translation)	27.08.2018	E1/29.1-29.4		
32.	<sup>*</sup> PS of Pun Wai-shan	03.09.2018	E6/1585-1595		
33.	<sup>*</sup> PS of Pun Wai-shan (English Translation)	03.09.2018	E6/1595.1- 1595.10		
34.	<sup>*</sup> WS of <b>Cheung Chiu-fung</b>	27.08.2018	E5/875-879		<b>C</b>
35.	<sup>*</sup> WS of Cheung Chiu-fung (English Translation)	27.08.2018	E5/879.1-879.5		
36.	<sup>*</sup> PS of Cheung Chiu-fung	03.09.2018	E6/1575-1584		
37.	<sup>*</sup> PS of Cheung Chiu-fung (English Translation)	03.09.2018	E6/1584.1- 1584.10		
	<b>Leighton</b> (Bundle C)				
38.	<sup>*</sup> WS 1 of <b>Karl Speed</b>	14.09.2018	C11/7593-7630	✓	<b>E</b>
39.	<sup>*</sup> WS 2 of Karl Speed	14.09.2018	C12/8091-8093		
40.	<sup>*</sup> WS 1 of <b>Anthony Zervaas</b>	14.09.2018	C12/7673-7680	✓	<b>E</b>
41.	<sup>*</sup> WS 1 of <b>Edward Mok</b>	14.09.2018	C12/8107-8119	✓	<b>C</b>
42.	<sup>*</sup> WS 1 of <b>Andy Ip</b>	14.09.2018	C12/8158-8163	✓	<b>C</b>
43.	<sup>*</sup> WS of <b>Raymond Brewster</b>	02.10.2018	C27/20104-20109		<b>E</b>
44.	<sup>*</sup> WS of <b>Stephen Lumb</b>	02.10.2018	C27/20110-20115		<b>E</b>
44.1	<sup>*</sup> WS 2 of Stephen Lumb	09.10.2018	C27/20887-20891		



No.	Document	Date	Page(s)	RWS filed	Oral Evidence
45.	*WS of <b>Joe Tam</b>	02.10.2018	C27/20611-20615		<b>C</b>
46.	^WS of <b>Gabriel So</b> (with English translation)	02.10.2018	C27/20654-20659	✓	<b>C</b>
47.	^WS of <b>Man Sze Ho</b>	26.09.2018	C27/20660-20666	✓	<b>C</b>
48.	^WS of <b>Chan Chi Ip</b> (with English translation)	28.09.2018	C27/20667-20673	✓	<b>C</b>
49.	*WS of <b>Malcolm Plummer</b>	01.10.2018	C27/20674-20678		<b>E</b>
50.	^WS of <b>Joe Leung</b>	29.09.2018	C27/20679-20684		<b>C</b>
51.	*WS of <b>Khyle Rodgers</b>	02.10.2018	C27/20685-20690	✓	<b>E</b>
52.	*WS of <b>Ian Rawthorne</b>	02.10.2018	C27/20691-20696		<b>E</b>
53.	*WS of <b>Gary Chow</b>	02.10.2018	C27/20713-20716		<b>C</b>
53.1	*WS of <b>Brett Buckland</b>	09.10.2018	C27/20800-20811	✓	<b>E</b>
53.2	*WS of <b>Justin Taylor</b>	09.10.2018	C27/20831-20842	✓	<b>E</b>

^No documents referred to in these statements according to the corresponding party.

### Bundle WS2 \* Annotated

No.	Document	Date	Page(s)	RWS filed	Oral Evidence
	<b>MTRCL (Bundle B)</b>				
54.	*WS of <b>Frederick Ma Si-Hang</b>	13.09.2018	B1/104-114		<b>E</b>
55.	*WS of <b>Lincoln Leong Kwok Kuen</b>	14.09.2018	B1/115-130		<b>E</b>
56.	*WS of <b>Dr. Wong Nai Keung Philco</b>	14.09.2018	B1/131-153	✓	<b>C</b>
57.	*WS of <b>Lee Tze Man</b>	14.09.2018	B1/154-166		<b>C</b>
58.	*WS of <b>Wong Chi Chung, Jason</b>	13.09.2018	B1/167-180		<b>C</b>
59.	*WS of <b>Aidan Gerald Rooney</b> (“Aidan Rooney”)	14.09.2018	B1/181-217		<b>E</b>
60.	*PS 1 of Aidan Rooney	16.08.2018	B5/3022-3023		
61.	*PS 2 of Aidan Rooney	16.08.2018	B5/3031-3036		
62.	*PS 3 of Aidan Rooney	20.08.2018	B5/3041-3044		
63.	*PS 4 of Aidan Rooney	20.08.2018	B5/3045-3049		
64.	*WS of <b>Ngai Yum Keung, Clement</b>	14.09.2018	B1/232-238		<b>C</b>
65.	*WS of <b>Leung Fok Veng, Andy</b>	14.09.2018	B1/239-258		<b>C</b>
66.	*WS of <b>Chan Kit Lam</b>	13.09.2018	B1/262-287	✓	<b>E</b>
67.	*WS of <b>Ho Ho Pong James</b>	14.09.2018	B1/320-354		<b>C</b>
68.	*WS of <b>Ma Ming Ching Derek</b>	13.09.2018	B1/355-372		<b>C</b>
69.	*WS of <b>Kwan Pak Hei Louis</b>	13.09.2018	B1/373-398	✓	<b>C</b>
70.	*WS of <b>Wong Chi Chiu</b> (“Kobe Wong”)	20.08.2018	B1/417-447	✓	<b>C</b>
71.	*WS of <b>Wong Kai Wing, Andy</b>	12.09.2018	B1/448-461	✓	<b>C</b>
72.	*WS of <b>Chan Yuk Hung</b> (“Henry Chan”)	11.09.2018	B1/464-469		<b>C</b>
73.	*WS of <b>Wu Ka Wah Carl</b>	13.09.2018	B1/470-483		<b>E</b>
74.	*WS of <b>Yeung Chi Kin</b>	13.09.2018	B1/484-492		<b>C</b>
	<b>THB &amp; HyD (Bundle G)</b>				
75.	*WS of <b>Chan Fan</b>	07.09.2018	G3/1751-1767		<b>E</b>

No.	Document	Date	Page(s)	RWS filed	Oral Evidence
76.	*WS of <b>Pun Ting Ting Rebecca</b>	07.09.2018	G3/1852-1860		<b>E</b>
77.	*WS of <b>Cheng Nim-tai, Raymond</b>	07.09.2018	G3/2020-2023		<b>C</b>
78.	*WS of <b>Leung Sai-ho</b>	07.09.2018	G3/2024-2029		<b>C</b>
79.	*WS of <b>Giang Tsz Sheung Keith</b>	07.09.2018	G3/2051-2052		<b>E</b>
80.	*WS of <b>Lai Wai Yin (Vanessa Lai)</b>	07.09.2018	G3/2053-2055		<b>C</b>
81.	*WS of <b>蘇佩賢</b>	03.09.2018	G3/2056		<b>C</b>
82.	*WS of <b>Chung Kum-wah</b>	29.08.2018	G3/2058-2074		<b>C</b>
83.	*WS of <b>Leung Man-ho</b> (“Jonathan Leung”)	07.09.2018	G3/2075-2087		<b>C</b>
84.	*WS of <b>Li Tsz Wai, Ralph</b> (“Ralph Li”)	07.09.2018	G3/2088-2098		<b>C</b>
85.	*PS 1 of Ralph Li	29.06.2018	G9/7000-7001		
86.	*PS 2 of Ralph Li	25.07.2018	G9/7002-7005		
87.	*PS 3 of Ralph Li	30.07.2018	G9/7006-7007		
88.	*PS 4 of Ralph Li	07.08.2018	G9/7015-7016		
89.	*PS 5 of Ralph Li	09.08.2018	G9/7020-7021		
90.	*WS of <b>Chu Tun Hon</b> (“Vincent Chu”)	07.09.2018	G3/2108-2111		<b>C</b>
91.	*WS of <b>Wong Ying</b> (Christie Wong)	07.09.2018	G3/2150-2152		<b>C</b>
<b>DevB &amp; BD (Bundle H)</b>					
92.	*WS of <b>Loo Kam-wah. Maurice, JP</b>	12.09.2018	H6/1124-1126		<b>E</b>
93.	*WS of <b>Chau Siu-hei</b>	31.08.2018	H6/1128-1135		<b>C</b>
94.	*WS of <b>Cheung Tin Cheung</b>	12.09.2018	H7/2107-2115		<b>C</b>
95.	*WS of <b>Ho Hon Kit</b>	13.09.2018	H7/2167-2186	✓	<b>C</b>
96.	*WS of <b>Lok Pui Fai</b>	13.09.2018	H7/2187-2213		<b>C</b>
97.	*PS 1 of Lok Pui Fai	09.07.2018	H14/34996-34998		
98.	*PS 2 of Lok Pui Fai	17.07.2018	H14/34999-35007		
99.	*PS 3 of Lok Pui Fai	25.07.2018	H14/35008-35012		
100.	*PS 4 of Lok Pui Fai	23.08.2018	H14/35174-35175		
101.	*PS 5 of Lok Pui Fai	19.09.2018	H18/38810-38815		
102.	*PS of <b>Wong Wing Wah</b>	07.08.2018	H14/35013-35016		<b>C</b>
103.	*PS of <b>Fan Tak Pun Patrick</b>	07.08.2018	H14/35093-35097		<b>C</b>

**RWS. Bundle of Responsive Witness Statements (RWS) (without exhibits)**

**Bundle RWS 1 \* Annotated**

No.	Document	Date	Page(s)	Oral Evidence
	<b>Intrafor</b> (Bundle F)			
II	*WS 3 of <b>Jean-Christophe, Jacques-Oliver Gillard</b>	16.10.2018	F35/24260-24272	<b>E</b>
	<b>Hung Choi</b> (Bundle I)			
	<b>China Technology</b> (Bundle D)			
CT1.	*WS 3 of <b>Poon Chuk Hung Jason</b>	11.10.2018	D2/1001-1004	<b>C</b>
CT2.	*WS 3 of <b>But Ho-Yin Ian</b>	12.10.2018	D2/1005-1006	<b>C</b>
	<b>Fang Sheung</b> (Bundle E)			
	<b>Leighton</b> (Bundle C)			
L1.	WS 3 of <b>Karl Speed</b>	18.10.2018	C32/24113-24115	<b>E</b>
L2.	WS 2 of <b>Anthony Zervaas</b>	15.10.2018	C32/24656-24660	<b>E</b>
L3.	WS 2 of <b>Edward Mok</b>	18.10.2018	C32/24086-24095	<b>C</b>
L4.	WS 2 of <b>Andy Ip</b>	18.10.2018	C32/24074-24077	<b>C</b>
L5.	WS 2 of <b>Gabriel So</b> (with English translation)	18.10.2018	C32/24103-24112	<b>C</b>
L6.	WS 2 of <b>Man Sze Ho</b>	18.10.2018	C32/24078-24085	<b>C</b>
L7.	WS 2 of <b>Chan Chi Ip</b> (with English translation)	18.10.2018	C32/24057-24073	<b>C</b>
L8.	WS 2 of <b>Khye Rodgers</b>	18.10.2018	C32/24096-24102	<b>E</b>
L9.	WS 2 of <b>Brett Buckland</b>	18.10.2018	C32/24020-24030	<b>E</b>
L10.	WS 2 of <b>Justin Taylor</b>	18.10.2018	C32/24368-24375	<b>E</b>
	<b>MTRCL</b> (Bundle B)			
M1.	*WS of <b>Dr. Wong Nai Keung Philco</b>	09.10.2018	B16/13617-13618	<b>C</b>
M2.	*WS of <b>Chan Kit Lam</b>	12.10.2018	B16/13619-13621	<b>E</b>
M3.	*WS 2 of <b>Kwan Pak Hei Louis</b>	08.10.2018	B16/13622-13627	<b>C</b>
M4.	*WS of <b>Wong Chi Chiu</b>	12.10.2018	B16/13654-13671	<b>C</b>
M5.	*WS of <b>Wong Kai Wing, Andy</b>	12.10.2018	B16/13672-13673	<b>C</b>
M6.	*WS of <b>Raymond Au Koon-Shan</b>	12.10.2018	B16/13674-13676	
M7.	*WS of <b>Fu Yin Chit</b>	12.10.2018	B16/13679-13686	
	<b>THB &amp; HyD</b> (Bundle G)			
	<b>DevB &amp; BD</b> (Bundle H)			
D1	*WS2 of <b>Ho Hon Kit</b>	16.10.2018	H20/40054-40064	<b>C</b>



SAT

Area A

Coliseum

Area B

Area C1

Area C2

Area C3

NAT

