

**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**

FOURTH WITNESS STATEMENT OF JUSTIN TAYLOR

I, JUSTIN TAYLOR, of 39/F Sun Hung Kai Centre, 30 Harbour Road, Hong Kong, say as follows:

1. I refer to my first witness statement dated 9 October 2018, my second witness statement dated 18 October 2018 and my third witness statement dated 2 November 2018. Unless otherwise stated or the context otherwise requires, the abbreviations shall bear the same meaning as in my First Witness Statement.
2. I make this fourth witness statement to supplement my previous witness statements and to explain the documents titled “As-built for on site assembly of EWL Slab to D-wall/slab coupler”. An example of these documents is shown at **C8648** to **C8651**.
3. Any allegations or matters raised in the statements mentioned in paragraph 2 above (or any other statements) which are inconsistent with my witness statements are denied. If I do not address any allegations or matters raised in other witness statements, it should not be construed as an admission on my part.
4. Unless otherwise stated, the facts stated herein are within my personal knowledge and are true. Where the facts and matters stated herein are not within my own knowledge, they are based on the stated sources and are true to the best of my knowledge, information and belief.

As-Built for On Site Assembly of EWL Slab to D-Wall/Slab Coupler

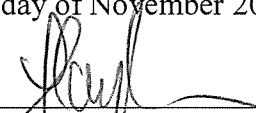
5. I was called by Leighton’s Project Director to come back to the site office on 1st June 2018 to coordinate the collation of records for BD and MTRCL’s

inspection. At that time, several other engineers were also called back to the site office to assist with the collation of information relating to their respective areas of responsibility for the EWL Slab and NSL Slab.

6. During June 2018, I was managed the task of collating the information and records regarding the EWL Slab and NSL Slab. This included instructing the engineers in the site office to collate relevant drawings, photos, temporary works forms (TW4) and material reports.
7. The document titled “As-built for on site assembly of EWL Slab to D-wall/slab coupler” was prepared by Leighton’s engineers during June 2018. The template for the document originated from Stephen Lumb’s design engineering team. I believe it was Stephen Lumb who directed the “As-built for onsite assembly of couplers” document to be prepared. I do not recall who was involved in completing each of the documents. I was not responsible for the preparation of the documents or managing the team on that task.
8. My understanding is that the “As-built for onsite assembly of couplers” documents were created as a summary record based on contemporaneous records of the inspections, the cast-in situ quality control checklists and photos for the EWL Slab. They were intended to show the arrangement of couplers at the intersection of the EWL Slab and the diaphragm wall and to confirm that the connections between couplers and rebar at this intersection had been inspected.
9. Leighton has not represented and did not intend to represent that the “As-built for onsite assembly of couplers” documents constituted contemporaneous records. In fact, Leighton sent a letter to BD dated 29 August 2018 which relevantly stated that: *“[the documents titled “As-built for onsite assembly of couplers” show] the arrangement of couplers in each concrete pour. The original of these documents was [sic] produced in June 2018 and for some bays of the EWL Slab, the documents were updated recently to generally reflect the*

replacement of couplers with straight through bars for the East D-wall connection in Areas B and C.”

Dated the ^{22nd} day of November 2018.

Signed: _____


Justin Taylor