**Christopher Ross Gidla**

**Attorney at Law**

**Gidla and Associates**

**123 Duke Street**

**Port of Spain**

**Bar no.GIC2006148**

**Tel/Fax: 624-4410**

**THE REPUBLIC OF TRINIDAD AND TOBAGO**

**IN THE HIGH COURT OF JUSTICE**

Claim # No.CV 2011-06610

BETWEEN

**TYRONE GIBBS Claimant**

**AND**

**RBTT BANK LIMITED**

**Defendant**

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**LIST OF DOCUMENTS**

This list is completed in accordance with an order for –

1. Standard disclosure Yes
2. Specific disclosure NO

Dated 5th of May, 2011

And is served on behalf of the Claimant

I, Tyrone Gibbs, of #37, Rose Wood Avenue, Coconut Drive, Morvant, Claimant certify that I have had explained to me

1. The duty of standard disclosure and
2. The terms of the order dated 5th of May, 2011 for specific disclosure and my duty to disclose documents in accordance with that order, and that I have complied with that duty.

The following is a list of ALL the documents which-

1. Are or were in the physical possession of the Claimant or
2. The Claimant has or has had a right to possession of or
3. The Claimant has or has had a right to inspect or take copies of, on which the Claimant relies or intends to rely in these proceedings together with such documents or classes of documents which the claimant was ordered to disclose by the order of the court dated 5th of May, 2011.

I claim a right to withhold disclosure and inspection of the documents listed in Part 2 of Schedule 1 on the basis stated in the Schedule.

Neither the Claimant nor his attorney at law nor anyone else on his behalf has now, or ever has had in his physical possession, now has the Claimant now or ever has had the right to possession or the right to take copies of any document which should be disclosed and inspected under the terms of the court’s order other than those listed in this list of documents.

Dated

Signed:

Claimant

**SCHEDULE 1**

**PART 1**

No. Details of document or class of documents Date

1. Medical Report of Tyrone Gibbs 17th of May, 2010
2. Letter from Noel John to the Manager of RBTT 31th of September, 2010
3. Letter from Elizabeth Ramdeo to the Attorney 1st of Febrary, 2010
4. Letter from Elizabeth Ramdeo to Mr.Noel John 29th of November, 2010
5. Letter from Elizabeth Ramdeo to Mr.Noel John 16th of December, 2010

**Pleadings**

1. Claim Form and Statement of Case 16th of February,2011

SCHEDULE 1

PART 2

PRIVILEGED DOCUMENTS

All statements, correspondence, requisitions, receipts and vouchers passing between the Claimant and its Attorneys-at-law, Gidla & Associates, and/or other legal advisors and all correspondence passing between any witness or potential witnesses for the Claimant and its said attorneys without prejudice correspondence, private and confidential correspondence between the parties and/or their legal advisors.

**SCHEDULE 2**

Originals of the documents listed in Part 1 of Schedule 1 which are not addressed to the Claimant and which are in the possession of the person/s to whom they are addressed issued or delivered.

**NOTICE TO INSPECT**

The documents listed in Part 1 of Schedule 1 may be inspected at the offices of Gidla & Associates, attorneys at Law, 18 – 20 Pembroke Street, Port of Spain, Attorneys at Law for the Claimant on any normal working day from Monday to Friday between the hours of 8:00 to 4:00 by appointment.

Dated this , 2011

Christopher Gidla

Attorney at Law

Gidla & Associates

18- 20 Pembroke Street

Port of Spain

Attorneys at law for the claimant

To: the Registrar

High Court of Justice

Knox Street

Port of Spain

And

To: Sarah Sinanan

M.G.Daly & Partners

Attorneys at Law

115 A Abercromby Street

Port of Spain