

**BETWEEN:**

**PRIVACY INTERNATIONAL**

**Claimant**

**-and-**

**(1) SECRETARY OF STATE FOR FOREIGN AND COMMONWEALTH AFFAIRS**

**(2) SECRETARY OF STATE FOR THE HOME DEPARTMENT**

**(3) GOVERNMENT COMMUNICATIONS HEADQUARTERS**

**(4) SECURITY SERVICE**

**(5) SECRET INTELLIGENCE SERVICE**

**Respondents**

---

**Index for OPEN Bundle  
Hearing 26 February 2018**

---

Tab	Document	Date	Page Number
	<b>Witness Statements</b>		
1	First GCHQ Amended Witness Statement	08.07.16	1-33
2	Second GCHQ Amended Witness Statement and Exhibit GCHQ3	06.03.17	34-54
3	Third GCHQ Witness Statement	02.03.17	55-66
4	Fourth GCHQ Witness Statement and Exhibits GCHQ 9, 10 and 11	16.06.17	67-78
5	Fifth GCHQ Amended Witness Statement	07.07.17	79-89
6	(Sixth) GCHQ Witness Statement and Exhibit	16.10.17	90-93
7	Seventh GCHQ Witness Statement	18.10.17	94-96
8	Eighth GCHQ Witness Statement and Exhibits GCHQ 13-15	15.12.17	97-132
9	Ninth GCHQ Witness Statement	15.12.17	133-135
10	Tenth GCHQ Witness Statement	15.12.17	136-142

11	Eleventh GCHQ Witness Statement	19.02.18	143-145
	<b>Pleadings</b>		
12	Claimant's RFI	07.03.17	146-151
13	Respondents' Amended OPEN Response to RFI of 7 March 2017	02.05.17	152-165
14	Claimant's Outline of Additional Issues	02.05.17	166-170
15	Claimant's Draft List of Issues	02.05.17	171-174
16	Respondents' Re-Re-Amended OPEN Response to the RFI dated 17.02.17	28.04.17	175-185
17	Respondents' Re-Amended OPEN Response to RFI dated 7 March 2017	10.05.17	186-198
18	Respondents' Response to RFI re Fifth GCHQ Witness Statement	26.07.17	199-205
19	Claimant's Skeleton Argument for October 2017 Hearing	22.09.17	206-233
20	Respondents' Replacement Skeleton Argument for October 2017 Hearing and Annex	12.10.17	234-262 263-300
21	Claimant's Reply	13.10.17	301-309
	<b>Orders</b>		
22	Order	08.09.17	310-313
23	Order regarding Cross Examination	26.01.18	314-315
	<b>Correspondence</b>		
24	Claimant's Second letter	29.03.17	316-317
25	Respondents' Reply to Claimant's letter of 29 March	03.04.17 (wrongly dated 2016)	318-320
26	Respondents' Letter	02.05.17	321
27	Respondents' Letter	13.06.17	322-323
28	Claimant's Letter	15.06.17	324-325
29	IPCO Letter	19.09.17	326-330

30	Claimant Letter	08.01.18	331-332
	<b>Commissioner Reports/Documents</b>		
31	IOCCO Inspection of GCHQ	26- 27.11.15	333-336
32	IOCCO Inspection of GCHQ	25- 26.04.17	337-349
33	IPCO Draft Report	15.09.17	350-353
34	Letter from GCHQ to IPCO	08.11.17	354
35	IPCO Letter	10.11.17	355-356
36	IPCO Letter to IPT	14.11.17	357-360
37	IPCO email to IPT	28.11.17	361-362
	IPCO Letter to GCHQ		363-365
	<b>Miscellaneous</b>		
38	GCHQ OPEN Policy for staff from OGDs and SIA Partners		366-372
39	s.45 and s.94 Telecommunications Act 1984		373-376
40	OPEN note of closed Hearing of 10 January 2018	01.02.18	377-388

