

**GARTH BLAKE S.C.**

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Attention: Mr Roland

Dear Partners

**North Coast Children's Home**

I refer to my conference with The Revd Pat Comben, Mr Sheaffe and your Mr Roland on 6 December 2006. I enclose for your consideration the following two draft letters:

1. A letter denying liability.
2. A without prejudice letter inviting the alleged victims to participate in the Pastoral Care and Assistance Scheme of the Diocese of Grafton.

My preliminary view, based upon my current instructions, is that neither the Bishop of the Diocese of Grafton nor the Corporate Trustees of the Diocese of Grafton is liable to the alleged victims. The letters not be sent until further enquires as to the minutes of the Corporate Trustees of the Diocese of Grafton, the dealings with respect to the Keen Street property recorded in the Land Titles Office and any diocesan records regarding employment of the staff of the North Coast Children's Home have been inspected.

If the Diocese of Grafton so wishes, the features of the Pastoral Care and Assistance Scheme referred to in the enclosed without prejudice letter can be amended to provide that the facilitators could make as determination as to the amount financial assistance. The facilitators would then need to be called assessors.

For your convenience I have sent this letter and the enclosed draft letters to your Mr Roland by email. I look forward to hearing from you.

Yours faithfully

GARTH BLAKE S.C.