



29 October 2015

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By email: david.abernathy@corrs.com.au / julie.cameron@corrs.com.au

Dear Mr Abernathy / Ms Tay

Royal Commission into Institutional Responses to Child Sexual Abuse (Royal Commission)
Case Study 34: Brisbane Grammar School & St Paul's Anglican School

The purpose of this letter is to advise you as to evidence that we expect will be given during the hearing in relation to Mr David Coote, whom you have confirmed instructions to act on behalf of.

BQA (allocated pseudonym BQA), a former student and alleged victim of Kevin Lynch at Brisbane Grammar School, has been summoned to appear to give evidence before the Royal Commission. Although we are unable to confirm the date, we expect he will give his evidence on 4 November 2015. BQA has not, at this stage, provided a statement to the Royal Commission, however, we anticipate that BQA evidence will traverse allegations of sexual abuse by Kevin Lynch, which he also alleges Mr Coote, as the then Deputy Headmaster, had knowledge. In particular, BQA evidence is expected to include:

- An alleged conversation between Mr Coote and BQA, where Mr Coote questioned him about an 'inappropriate sexual relationship' between BQA and Mr Lynch. It is anticipated that BQA will allege that Max Howell, then Headmaster at Brisbane Grammar, entered the counselling room during one of BQA sessions with Mr Lynch and saw BQA partially naked and masturbating. A short time later BQA was summoned to Mr Coote's office where Mr Coote discussed with him the inappropriate nature of his relationship with Mr Lynch. We anticipate that it will be alleged that Mr Coote then led BQA to believe that the inappropriate relationship was somehow his fault and that he would be punished for it.
- We anticipate that BQA will give evidence that subsequent to this meeting, Mr Coote suspended or expelled him from the school.

Assuming that BQA gives evidence to the effect set out above, I expect that counsel assisting will put these matters to Mr Coote for his response. A Summons to Appear at the upcoming public hearing will be served on Mr Coote shortly. We will give you BQA signed statement as soon as practicable after it has been received. We will invite Mr Coote to respond in a statement.

We refer you to tab 52 of the BGS tender bundle (DOC.203.001.196_R) which is an unsigned statement prepared by Mr Coote in 2002.

Please contact Kimberley Rose on [REDACTED] or [REDACTED] or Anne Saab on [REDACTED] or [REDACTED] if you would like to discuss any aspect of this letter.

Yours sincerely,



Tony Giugni

Solicitor Assisting

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