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& GORDON**

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1 December 1994

**BARRISTERS & SOLICITORS**

Reply to:

OUR REF:

YOUR REF:

PG:tm

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Private & Confidential

Attention: Mr Howard Harrison  
Messrs Carroll & O'Dea

Solicitors  
DX 183  
SYDNEY

"Without Prejudice"

Via facsimile: (02) 221 1117

Dear Howard,

RE: Christian Brothers Litigation

Further to our discussion this afternoon and following your request I write to suggest that it may not be too late for us to explore a lateral solution to the West Australian Christian Brothers Litigation.

1. As a guess I think it would involve a total cost of \$18,000,000.00 to \$20,000,000.00.
2. We would suggest that victims of non sexual abuse that can demonstrate latent psychiatric injury receive nominal payments.
3. Payments could be made to those suffering psychiatric disability as a consequence of sexual abuse on the basis of an assessment of the degree of psychiatric disability made by a psychiatrist, the identify of whom might be agreed between us.
4. The method of disposition of the litigation may be discussed between us and public statements made by major parties in the litigation may also be discussed.
5. A method for resolving the claims of those who are yet to come forward may be incorporated in the scheme.

Howard, as I indicated to you I already have some spreadsheets and some written thoughts about how this might be done and I would be happy to meet with you some time before Monday if there were a realistic prospect of advancing the issues. I would also agree to seek by consent to adjourn our proceedings before Justice Levine until such time as it may take to work these issues through.

Mr Howard Harrison

1 December 1994

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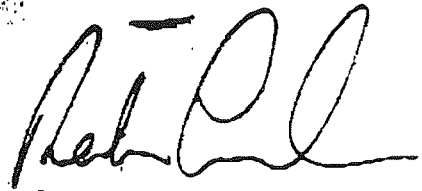
Finally, here are my telephone numbers over the next few days:-

REDACTED

- direct line
- home number
- mobile number

Yours faithfully  
SLATER & GORDON

per:

A handwritten signature in black ink, appearing to be 'Peter All', written over a faint, illegible stamp.