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SLATER & GORDON

BARRISTERS & SOLICITORS

HOLSON STREET
RAY 3011
15 11
D.A. 81114
03 689 9622

Reply to

OUR REF

YOUR REF

AMF:HS:AS

HGH

15 October 1993

PRIVATE & CONFIDENTIAL

ATTENTION: Mr Howard Harrison

Messrs. Carroll & O'Dea
Solicitors
DX 183
SYDNEY

Dear Sirs,

RE: POTENTIAL CLAIMS FOR PERSONS WHO ALLEGE ABUSE WHILST UNDER THE CARE, CONTROL AND MANAGEMENT OF THE CHRISTIAN BROTHERS AT THE INSTITUTIONS OF BINDOON, CLONTARF, CASTLEDARE AND TARDUN IN WESTERN AUSTRALIA.

We refer to your letter dated 11 October 1993 and to the telephone conversation between yourself and our Ms. Farrell on 13 October 1993.

We have recently received instructions from persons who allege they have suffered various forms of abuse whilst under the care and control of the Christian Brothers at the Institutions of Bindoon, Clontarf, Castledare and Tardun in Western Australia. ("the institutions").

The instructions which we have received relate to the period 1940 to 1970 ("the relevant period").

We do not wish to join unnecessary defendants to any proceedings to be issued, and are anxious to avoid any undue embarrassment to any church group(s), order(s) or person(s).

With this aim in mind, we would be pleased if you or your client could provide us with any information and/or documentation which may assist us in our investigations. In particular, we request clarification of the following:-

1. Was your client in a position of authority/responsibility/control of any one of these institutions for any part of the relevant period.
2. Did your client have control or responsibility over the standards of education and/or discipline enforced at these institutions for any part of the relevant period?

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3. Was your client in any way involved in the Child Migration Scheme which operated in or about the relevant period?

We would be happy to discuss these matters with you should you wish to do so.

If we are able to obtain adequate answers to these questions, we will be able to reduce the number of Defendants in proceedings to be issued.

We hope your client would agree that these claimants should be spared any technical problems in the resolution of their claims which stems from a lack of clarity as to the legal structures of the Christian Brothers.

As stated previously, we have no wish to cause undue embarrassment to your client and would therefore appreciate your co-operation in relation to the matters raised in this letter.

All correspondence should be sent to the following address, marked to the attention of Mr. Peter Gordon:

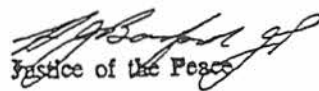
Messrs. Slater and Gordon
DX 229
MELBOURNE

Phone: (03) 602 4855
Facsimile: (03) 600 0290

Yours faithfully,
SLATER & GORDON

Per:

and the preceding page are
This is the annexure marked "B" referred to
in the Affidavit of HOWARD C. HICKSON
sworn the 25 day of 3 1994 at Sydney
before me:


A Justice of the Peace

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