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HGK

18 November 1993

Messrs Slater & Gordon
 Solicitors
 DX 81114 MELBOURNE
 229.

Attention: Attention: Mr Peter Gordon
 Facsimile No: 613-6000290

Dear Sirs

RE: CLAIMS FROM MR VZ AND MR VY

We refer to your letter of 17th November last.

Before we can seek any detailed instructions in respect of the matters raised in your letter we would be pleased to receive by fax copies of your clients' Motions, any Affidavits in Support thereof, medical reports and all proposed Statements of Claim.

We would then expect to know the identity of the parties against whom your clients seek orders and be in a position to seek appropriate instructions.

We assume that in the meantime you will ensure that your client's Application is stood over accordingly. We would ask that a copy of this letter be provided to the Court on 24th November next.

We would also be pleased to receive you advices as to whether Messrs. VZ and VY are Plaintiffs in the New South Wales Proceedings.

We note that you apparently act on behalf of a number of persons who allege damage whilst attending the Christian

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Brothers Institutes. We note that allegations are apparently to be made in respect of events which are said to have occurred many years ago.

There has already been obvious prejudice to the Brothers in respect of any prospect of investigating the matters alleged to have occurred.

We therefore emphasise to you the prejudice which has occurred and the prejudice which continues to occur as a consequence of your refusal to particularise the individuals and allegations involved.

Furthermore we really must protest at the fact that notwithstanding multiple allegations against the Christian Brothers in the media which have done the Order irreparable harm, we are still in a position some three months after the making of the original allegations of not knowing the identity of the persons against whom allegations are made, the nature of the allegations, the alleged dates of and in all but two cases the names of the persons you represent.

We would suggest in such circumstances that your foreshadowment of an application that there be no publication of the identity of your clients endeavours to obtain a protection for your clients which over the last three months has not been extended to the Christian Brothers.

Yours faithfully
CARROLL & O'DEA
 Per:

and the preceding page are
 This is the annexure marked " F " referred to
 in the Affidavit of HOWARD C. CARROLL
 sworn the 25 day of 3 1974 at Sydney
 before me:


 A Justice of the Peace