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 Your ref: PJD:dk:ISA990279 [Peter Deed]

27 October 1999

Cranston McEachern  
 Lawyers & Attorneys  
 DX 143  
 BRISBANE

**DRAFT**

**WITHOUT PREJUDICE**

Dear Colleagues

**Re: The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane -  
 ats- Joan Isaacs**

We refer to your letter of 11 October 1999. With respect, our discussion with Mr Deed on 8 October 1999 was left on the basis that we were to "tell the Church they have another seven days" and if a substantive response to the money claim was not hand, your client "will be suing". What we have tried to make abundantly clear to you is that we are working through a process with the Church in relation to the significant cash damages claim your client has presented. Despite your advice to us that your client was not pursuing a "civil liability claim", quite clearly, with respect, that is the case and we note your advice that the matter is now to be litigated.

In our view it is clear that the parties have different understandings with respect to the *Towards Healing* process and protocol. "Compensation" in that arena can be directed towards reimbursement of properly incurred medical expenses in appropriate cases. The protocol otherwise seeks to provide for assessment and where ongoing needs exist, continuing assistance designed to promote a process of healing. As we have previously indicated, *Towards Healing* is not a monetary compensation protocol in the sense of a process that deals with a substantial civil common law claim. No assessment by the Church interferes in any way with the processes of civil or criminal law.

In this instance your client seeks a substantial common law payment made up as follows:-

General, exemplary and aggravated damages	\$49,000.00
Special damages	1,710.50
Future medical expenses	1,724.50
Future medication costs (per year)	240.00
Future medical treatments	7,840.00