

**LIESCHKE & WEATHERILL**

10 June, 2004

Our Ref: critch24lsl.wpd  
File No: 240166O'Loughlins Solicitors  
DX 56606  
**ADELAIDE**

11 JUN 2004

**Attention: Mr Fuller****BY FACSIMILE**

Dear Sir

**FAXED**  
10/6/04**OUR CLIENT: MICHAEL CRITCHLEY**

We advise that we now act for Mr Critchley, in relation to his employment.

We refer to your letter of 3 June 2004, requesting our client to attend a meeting with a panel, for the purpose of reviewing and discussing the relevant information and to give our client an opportunity to make any submissions in relation to the report of Brian Hayes QC.

We indicate that our client certainly wishes to correct the very significant errors contained in the report, which has wrongly criticised our client.

We advise that the writer has also spoken with Sandra Watkinson, the Social Worker referred to in the report. She indicated that she has not been interviewed in relation to these matters, although she did offer to be so interviewed when first asked by the Archbishop's office. She has relevant information as to her involvement in the School in 1991, which included discussions with the investigating Police, the investigating FACS officers, parents and staff.

Accordingly, it appears more appropriate, that Mr Hayes be given all of the further information that our client wishes to put forward, and which can be provided by Ms Watkinson, so that Mr Hayes can accurately consider and analyse the new material, with a view to reviewing the opinions expressed in his report. We note that Mr Hayes has specifically acknowledged the limitations of his report, in that he has not made any findings of fact, nor determined the credibility of the information provided to him, and that he was not provided with the full picture.

The proposed panel will be at a disadvantage, as compared with Mr Hayes, when considering the further material. This is more important, now that the report has been released by the Archbishop to the media.

O'Loughlins Solicitors

Page 2

We accordingly propose that our client provide a further written and signed statement to Mr Hayes, and that he be interviewed by Mr Hayes in relation to these matters.

We ask your client to consider this proposal.

We also request that you provide a copy of the panel's terms of reference, a copy of the audio tape of Archbishop Wilson's ABC radio interview of 2 June 2004, and a copy of the Archbishop's letter read at Mass on Sunday 6 June 2004 in all churches.

We look forward to hearing from you at your earliest convenience.

Yours faithfully

**LIESCHKE & WEATHERILL**

per;



**STEPHEN LIESCHKE**