

Donald Craig

DONAL CRAIG & ASSOCIATES

BARRISTER SOLICITOR COMMERCIAL MEDIATOR

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Our Ref: DGC:mh:StAnn's.11310

21 October 2002

The Director
Catholic Education Centre
116 George Street
THEBARTON SA. 5031

Attention: Allan Dooley

**RECEIVED
DIRECTOR'S OFFICE**

22 OCT 2002

.....1049.....

Dear Mr Dooley

Re: POSSIBLE CLASS ACTION IN RESPECT OF ST ANN'S SPECIAL SCHOOL

We advise that we act for the following students of St Ann's Special School:

- 1. MN [REDACTED]
- 2. LH [REDACTED]
- 3. LE [REDACTED]
- 4. LB [REDACTED]
- 5. LD [REDACTED]
- 6. MU [REDACTED]
- 7. LZ [REDACTED]
- 8. MB [REDACTED]
- 9. LA [REDACTED]
- 10. LX [REDACTED]
- 11. LC [REDACTED]
- 12. LG [REDACTED]
- 13. LF [REDACTED]

and their respective parents/guardians:

- 1. RED & REDACTED [REDACTED]
- 2. NL & NK [REDACTED]
- 3. LO [REDACTED]
- 4. LK [REDACTED]
- 5. LN & NJ [REDACTED]
- 6. NO & NM [REDACTED]
- 7. REDACTED [REDACTED]
- 8. REDA & REDACTED [REDACTED]
- 9. LJ & LI [REDACTED]
- 10. REDACTED [REDACTED]
- 11. LM [REDACTED]
- 12. LS & LR [REDACTED]

We advise that we have been instructed to pursue a claim for compensation in respect of physical and sexual abuse which occurred to some or all of the abovementioned students of St Ann's Special School during the late 1980's and early 1990's through the actions of a former employee of the school, Brian Perkins and others.

By way of pre-action discovery pursuant to Rule 60 of the *District Court Rules* we would seek discovery of the following documentation held by the Catholic Education Office:


1. The entire personnel file of Brian Perkins.
2. Copies of any notations or documentation substantiating any complaint made by a student, teacher, parent or member of the public to the Catholic Education Office in respect of the physical or sexual misconduct of Mr Brian Perkins during his employment with St Ann's Special School.
3. Copies of the entire files relating to each and every one of the above students.

We would hope that given the degree of pain and difficulties our clients have already suffered in relation to this matter that Catholic Education Office would do everything in their power to facilitate and co-operate with such request.

Should there be any difficulty in this regard please contact the writer.

We hereby give notice that a copy of this letter may be produced to any Court called upon to consider an application for pre-action discovery pursuant to Rule 60 of the *District Court Rules*.

Yours faithfully



DONAL CRAIG

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Dear Mr Dooley

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- 1. MN
- 2. LH
- 3. LF
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- 3. LO
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- 5. LN REDACTED
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