

13th April 2004

Brian Hayes QC
Murray Chambers
12 Coglein Street
Adelaide SA 5000

Dear Brian,

St Ann's Special School


Further to my letter of 6th April 2004 I enclose the following:-

1. Copy of the constitution of St Patrick's School for Handicapped Children which was in force during the relevant period between 1986 and 1991 and which governed both St Ann's Special School and St Patrick's School.
2. A copy of the minutes of a special meeting of the governing body held on 10th October 1986 which approved the change of name of the association from St Patrick's School for Handicapped Children to Catholic Special Schools Inc.
3. A copy of the minutes of a meeting of the governing body held on 6th March 1991 which refers under the heading of General Business to the proposed new constitution.
4. A copy of the minutes of the AGM of the governing body on 3rd March 1992 approving and adopting the new constitution.

It is pertinent to note that School Reports in the minutes of the meeting of 3rd March 1992 make no reference whatever to the Perkins matter when it first became known in August 1991 which was during the period to which those reports related. That is consistent with the statements of David Prince and Paul Morrissey who indicate that the matter was not brought to the attention of the Board at a meeting.

Please let me know if there is anything further you require for the purposes of your advice.

Yours faithfully,



Tony Fuller

E M A

L E G A L

Adelaide Office

Tolley's Building
1st floor, 82 Waymouth Street
Adelaide South Australia 5000

Telephone: 08 8211 8455

Facsimile: 08 8211 8450

Website

www.emalegal.com.au

Partners

Rick Manuel
Tony Fuller
Samantha Merrigan
Susan Zeitz
Andrew Hodge

Consultant

Elizabeth Perry

Senior Associate

Kaye Noyen

Solicitors

Kate Spence
William Bourke
Deanna Oberdan

Melbourne Office

Level 3, 175 Flinders Lane
Melbourne Victoria 3000

Telephone: 03 9650 7381

Facsimile: 03 9650 5300