

Deed of release

Jennifer Ingham

(the Claimant)

The Trustees for the Roman Catholic Church for the Diocese of Lismore

Bishop Geoffrey Hylton Jarrett, the Bishop for the time being of the Diocese of Lismore

All prior and future Bishop of the Diocese of Lismore

(collectively Respondents)

Details

Date

Parties

Name	Jennifer Ingham of [REDACTED] [REDACTED]
Description	the Claimant
Name	The Trustees for the Roman Catholic Church for the Diocese of Lismore
Name	Bishop Geoffrey Hylton Jarrett , the Bishop for the time being of the Diocese of Lismore
Name	All prior and future Bishop of the Diocese of Lismore
Description	collectively the Respondents

Background

- A The Claimant says that:
- (a) she was sexually assaulted by Fr Rex Brown in or about the period 1978 to 1982, particulars of which are set out in her Towards Healing Contact Report dated 22 October 2012;
 - (b) as a result of such unlawful assaults, she sustained loss, damage and injuries and may require specialist counselling and therapy;
- B Fr Rex Brown was at all material times a Priest of the Roman Catholic Church for the Diocese of Lismore.
- C The Claimant has alleged that the Respondents are jointly and severally liable to her in respect of the Claim.
- D The Respondents recognise their pastoral obligations towards the Claimant but do not admit they are legally liable for the Claim or any loss, damage and injuries.
- E However, in order to avoid the cost, expense and inconvenience of litigation or further dispute the Respondents have agreed with the Claimant to settle the Claim on the terms set out in this document.

Deed

The Respondents shall pay to the Claimant the sum of \$ 265,000 ^{plus costs and} ~~inclusive of~~ ^{disbursements} any claim for interest and costs and subject to clause 2 (**Settlement Sum**). The Settlement Sum will be paid within 28 days of this document being signed and returned to the Professional Standards Office, GPO Box 3264 Brisbane, Queensland, 4001, and Medicare/Centrelink clearances being received whichever is the later. ^{fixed in the sum} ^{\$11,736.00}

2. In the event a person or body seeks to recover all or any part of the Settlement Sum from the Respondents for the repayment of social services including but not limited to Medicare, Centrelink and DEEWR services (**benefits**) or victim's compensation awarded and paid to the Claimant, the Claimant agree to indemnify them in respect of the repayment. Further, if the Respondents or their insurers are required to send part of the Settlement Sum to a statutory body in respect of benefits or victim's compensation or receive a statutory demand for repayment of benefits or victim's compensation, the Claimant authorise the Respondents to pay the amount sought out of the Settlement Sum and the amount payable under clause 1 will be reduced accordingly. The Claimant authorises the Respondents to provide Medicare Australia with a copy of this document if they are required by Medicare Australia to do so.
3. The Claimant and herself, her executors, administrators, heirs and assigns forever releases and discharges the Respondents, servants and agents both jointly and severally from all actions, suits, claims and demands of every description past present or future relating to or arising from the Claim or any of the matters set out in this release which he now has or which he might have had but for the signing of this document.
4. The Respondents may plead this document in bar to any claim or proceeding by the Claimant or any person claiming on their behalf in respect of the Claim.
5. The Claimant acknowledges that the payment made pursuant to this document by the Respondents is partly made by virtue of the fact that Fr Rex Brown, alleged by the Claimant to have caused loss, damage and injury, the subject of the Claim, was at all material times a Priest of the Roman Catholic Church for the Diocese of Lismore.
6. The Claimant acknowledges that by accepting the Settlement Sum and signing this document she is not entitled to make any further approach to the Respondents for financial assistance in respect of the Claim, including assistance with respect to any specialist medical advice or for damages or otherwise relating to the Claim.
7. In the event that any provision or part of this document is held to be void or invalid, such provision or part will be severed from the whole and the balance of the document or the provision (as the case may be) will remain in full force and effect.
8. This document sets forth the entire agreement between the parties to this document and supersedes any and all prior agreements or understandings between the parties relating to the Claim.
9. It is the intention of the parties that this document will be binding on all parties and the benefit of this document should extend to all persons and entities referred to throughout this document even though they are not parties to the document or they have not signed the document and the fact they are not a party or have not signed the document will not prejudice or affect their right to rely on this document.

Signing page

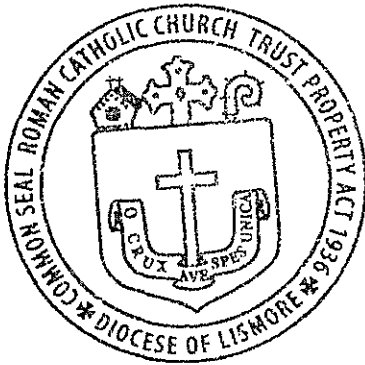
Signed sealed and delivered by each party as a deed

Signed by Jennifer Ingham

Jennifer Ingham
sign (signatory)

P. Keenan
sign (witness)

the witness states that he or she is not a party and was present when the signatory signed



Peter Keenan
full name (witness)

671 Hunter St
address (witness)

Newcastle

The Common Seal of the Trustees was hereunto affixed in the presence of the Bishop and two members under and in pursuance of a delegation made under section 9B of the Roman Catholic Church Trust Property Act 1936

Geoffrey Jarrett
sign (signatory)

C. S. Wallace
sign (witness)

the witness states that he or she is not a party and was present when the signatory signed

Geoffrey Hylton Jarrett
full name (signatory)

CHRISTOPHER JOHN WALLACE
full name (witness)

6 KEEN ST. LISMORE, NSW
address (witness)

Signed by Bishop Geoffrey Hylton Jarrett, the Bishop for the time of the Diocese of Lismore, in the presence of:

Geoffrey Jarrett
sign (signatory)

C. S. Wallace
sign (witness)

the witness states that he or she is not a party and was present when the signatory signed

CHRISTOPHER JOHN WALLACE
full name (witness)

6 KEEN ST. LISMORE, NSW.
address (witness)

Solicitor's certificate

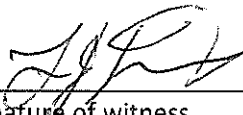
I, Peter Kelso, Director of Kelsos The Law Firm of 671-677 Hunter Street, Newcastle West, in the State of New South Wales, certify that:

1. I am a legal practitioner holding a current practicing certificate and I act for **Jennifer INGHAM**, the Claimant.
2. I have explained the purport and effect of the annexed document to the Claimant who appeared to me to understand the purport and effect of this document.
3. The Claimant voluntarily signed the above document.

DATED the 24 day of May 2013



Signature of solicitor



Signature of witness

LINDSAY INGHAM

Name of witness (please print)