

*Note: REDACTED were not settled at this time. REDACTED settled for \$450,000 and REDACTED settled for \$430,000.

Additionally, New Zealand Insurance contended that the Diocese should accept a 50% discount, based on the presumed awareness of Monsignor Cotter, which ultimately reduced the offer to \$723,392.86, which was then agreed to the \$800,000 accepted sum, as REDACTED and Certain costs were not to hand.

In our view, the 50% discount factor ultimately agreed was excessive. We were firmly of the view that our position would have been vindicated had the insurer declined to indemnify the Diocese and that decision been the subject of Court challenge. We ultimately decided to compromise our rights on commercial terms, namely any such litigation would be both expensive and helpful to existing Plaintiffs and potential Plaintiffs.

I trust this may provide you with an insight to a settlement by an insurer which has not received premium since year ended May 1981.

Kind Regards,

John Keenan

Laure.

*copies of (i) Settled Claims + Costs
(ii) copy of Settlement Deed with
N21.*

Regards

[Signature]