

Message

Page 1 of 3

**John Usher**

---

**From:** Danny Casey  
**Sent:** Wednesday, 3 August 2005 10:24 AM  
**To:** Michael Casey; John Usher  
**Subject:** FW: Catholic Archdiocese - Proper Defendant Argument

JU &amp; MC

Please see attached email from Corrs in relation to the property defendant argument.

I had thought that much of this advice had already been provided. If it is in several different places it makes some good sense to pull it all together into a special advice which can then be applied as required.

Given this, I am inclined to proceed - I would appreciate your thoughts for responding.

Can you please let me know whether you feel we should proceed.

Regards

**Danny Casey**  
Business Manager  
Catholic Archdiocese of Sydney  
Direct line: 02 9390 5180  
Fax: 02 9261 8312

**\*\*\*Confidentiality and Privilege Notice\*\*\***

This email message and any accompanying attachments may contain information that is confidential. If you are not the intended recipient, please do not read, use, disseminate, distribute or copy this message or attachments. If you have received this email message in error, please notify the sender immediately and delete the email message. Confidentiality and legal privilege are not waived or lost by reason of mistaken delivery to you. Before opening any attachments, please check them for viruses and/or other defects. To contact the Chancery Office of the Archdiocese of Sydney please telephone +61 2 9390 5100.

-----Original Message-----

**From:** Brad Woodhouse  
**Sent:** Thursday, 28 July 2005 2:01 PM  
**To:** Danny Casey  
**Subject:** FW: Catholic Archdiocese - Proper Defendant Argument

Danny

You will see below that Chris has estimated the costs of preparing the initial advice on the proper defendant argument to be around \$10,000.

Given Stephen Rushton SC's familiarity with the subject matter, Chris is comfortable that Stephen will be able to settle any draft for around \$2500.

16/08/2005

Message

Would you like me to provide Corrs with instructions to proceed?

Regards  
Brad

-----Original Message-----

**From:** Chris.Pagent@corrs.com.au [mailto:Chris.Pagent@corrs.com.au]

**Sent:** Thursday, 28 July 2005 1:44 PM

**To:** Brad Woodhouse

**Subject:** Re: Catholic Archdiocese - Proper Defendant Argument

Thanks Brad.

On the basis that the advice will take 2 days to draft, and having regard to its complexity, I estimate that our costs will be between \$8,500 and \$10,000. I think you can assume that Rushton SC will settle the draft for about \$2,500. We will get Annie to prepare the first cut, which I will develop. We'll get Stephen Rushton to run his eyes over it as quickly as possible.

I am away tomorrow and next Monday, but can start this advice on Tuesday next week.

Regards,

Chris.

"Brad Woodhouse" <bwoodhouse@ado.syd.catholic.org.au>

28/07/2005 10:48 AM

To: <Chris.Pagent@corrs.com.au>

cc:

Subject: Catholic Archdiocese - Proper Defendant Argument

Chris

I have spoken with Danny regarding the preparation of an advice in respect of the proper defendant argument.

I explained to Danny that, during the course of preparing for the RE and Ellis matters, Corrs has undertaken extensive research into the argument, and we should now seek to have that work crystallised down into an advice. Once the advice is prepared, we could review the advice, ask any further questions we may have, and then submit the advice to Senior Counsel, such as Stephen Rushton SC, for a final review.

This will serve two purposes. First, it will enable the Archdiocese to make an informed tactical decision of whether to run the argument. Secondly, it will ensure that the value of the work to date is not lost, and can be called upon in all future cases.

Danny is very keen for Corrs to prepare this advice, but before proceeding, wants to have an estimate of the cost of doing so. Can you please provide an estimate for the preparation of the initial advice which I can provide to Danny before obtaining instructions to proceed.

Regards

16/08/2005

Message

Page 3 of 3

**Brad Woodhouse**

Catholic Archdiocese of Sydney

Direct line: 02 9390 5316

Fax: 02 9261 8312

**\*\*\*Confidentiality and Privilege Notice\*\*\***

This email message and any accompanying attachments may contain information that is confidential. If you are not the intended recipient, please do not read, use, disseminate, distribute or copy this message or attachments. If you have received this email message in error, please notify the sender immediately and delete the email message. Confidentiality and legal privilege are not waived or lost by reason of mistaken delivery to you. Before opening any attachments, please check them for viruses and/or other defects. To contact the Chancery Office of the Archdiocese of Sydney please telephone +61 2 9390 5100.

This is an email from Corrs Chambers Westgarth or Corrs Support Services Pty Ltd. The email and any attachments may be confidential, legally privileged and/or subject to copyright. If you are not the intended recipient, you must not disclose or use the information contained in this e-mail. If you have received this email in error, please notify us immediately and delete the email and all copies. We do not guarantee that this email and any attachments are free from virus or other errors. We will not be responsible for loss or damage resulting (either directly or indirectly) from any such virus or error. We will only be responsible for a change to a document if we made the change. The content of and opinions expressed in non-business emails are not necessarily ours.

If this is a commercial electronic message within the meaning of the Spam Act, you may indicate that you do not wish to receive any further commercial electronic messages from us by sending an email to <mailto:privacy@corrs.com.au>

16/08/2005