

From: John.Dalzell@corrs.com.au<John.Dalzell@corrs.com.au>

Date Sent: Monday, 15 August 2005 09:27:34

Date Received: Monday, 15 August 2005 09:29:29

To: Anne-Marie Nassif</O=FIRST ORGANIZATION/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=ANNE-MARIE.NASSIF>; Michael Moore</O=FIRST ORGANIZATION/OU=FIRST ADMINISTRATIVE

GROUP/CN=RECIPIENTS/CN=MICHAEL>; john.usher@mail.ado.syd.catholic.org.au<john.usher@mail.ado.syd.catholic.org.au>

CC: Paul.McCann@corrs.com.au<Paul.McCann@corrs.com.au>

BCC:

Subject: Ellis - again

Attachment: Fax.tif

Dear Fr John and Michael

After some preliminary arguments on Friday morning, the Plaintiff's solicitors have refined their request for further and better particulars of our defence.

As a result, we have been served with a revised request for particulars, which I attach for your perusal. Could I ask you to have a look at this notice, particularly numbers 2 and 4. On 4 - we have already discussed our query about the existence of an organisation called the 'Archdiocesan Council'.

We will apply to set aside numbers 1 (irrelevant), 3, 7 and 9.

We have already produced documents in relation to 5 and 6.

I will ask Pauline Garland to try to locate the letters that are referred to by Archive Box number this morning. As a matter of curiosity, do you know how Ellis could know what the Archive Box numbers are? I don't want to sound conspiratorial, but would his second wife, Nicola, have access to any of these documents? Certainly, these documents are not contained in Duggan's personal file.

I am in a meeting this morning, but perhaps we could discuss this at some point today.

The case is back before the Judge tomorrow for argument, so I really need some instructions today.

Kind regards

John D

To: Sydney Fax

cc:

Subject: Fax Delivery from: 612 9232 5388

A 4 page fax has been received from 612 9232 5388. To view the fax, right click on the icon below and select Open from the popup menu.

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>