

08 '00 TUE 11:54 FAX 61 7 55730778 MAURICE KERRIGAN & ASSOC

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61 7 55730778



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OPERATOR *MM* AT *12:00* ^{AM} PM
 ADVISED TO AT AM PM
 DATE *15-8-00* INT/COI



LICENSED INVESTIGATORS CORPORATE SECURITY INSURANCE ASSESSORS

All Correspondence to:
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PRIVATE & CONFIDENTIAL

15 August 2000

Corrs Chambers Westgarth
 Lawyers
 1 Eagle Street
 BRISBANE QLD 4000

By facsimile 3228 9444
 (2 Pages)

Attention: *Ms Julie Cameron*

Dear Madam

RE: *HIH Insurance Limited - Potential Liability Claim*
Insured: Brisbane Grammar School
Potential Claims alleging sexual assault by former school counsellor

We confirm we act as assessors on behalf of Ligeti Partners, Lawyers representing HIH Insurance Limited, the professional indemnity insurers of the Brisbane Grammar School.

As per your discussions with Mr Brian Hall of our office, we have been instructed to fully investigate the circumstances of these potential sexual assault claims. Ligeti Partners have provided us with "scope of inquiries", which includes the following:-

- (1) *any documentation as to whether the Insured had any prior notification or knowledge of the allegations that Kevin Lynch had been sexually abusing students. We note from newspaper articles one former student, BQF [redacted] alleges he complained of abuse to a senior boarding house master, Ron Cochrane, who did nothing. Cochrane denies that any such complaint had been made; and*
- (2) *any documentation/information in relation to Kevin Lynch's work history with the Insured, the duties he performed and other relevant circumstances concerning the way he went about his duties. Also, any relevant documentation, including all school records, relating to Lynch.*

It would be appreciated if you could provide us with any of the above documentation, and also the following:-



CCW.075.0074

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MEM ASSOC OF INVESTIGATORS & SECURITY PROFESSIONALS



MEM ASSOC OF BRITISH INVESTIGATORS



MEM INTERNATIONAL ASSOC OF AUTO THEFT INVESTIGATORS

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RE: BRISBANE GRAMMAR SCHOOL

- (3) *the names, addresses and contact telephone numbers of any witnesses to these alleged claims;*
- (4) *any written statements or documentation in relation to the witnesses;*
- (5) *the names, addresses and contact telephone numbers of the potential Claimants, if known. If these potential Claimants are now represented, their legal representatives' names and contact details; and*
- (6) *any other relevant documentation/information you can provide in relation to this matter.*

Mr Brian Hall of our office will contact you shortly to arrange a mutually convenient time to attend your office to collect any documentation and carry out any further inquiries relevant to the documentation. Mr Hall can be contacted on home 07 3398 7049 or mobile 0429 493 747.

We thank you in anticipation of your cooperation.

Yours faithfully

[Signature]
MAURICE J. KERRIGAN & ASSOCIATES PTY LTD



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